

Edwin Aiwarzian (SBN 232943)
Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Selena Matavosian (SBN 348044)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs Alberto Gonzalez and James Picarello and the Class

[Additional counsel listed on following page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – COMPTON COURTHOUSE**

ALBERTO GONSALEZ, individually, and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiff,

vs.

CARLTON FORGE WORKS, a California
corporation; PRECISION CASTPARTS
CORP., an unknown business entity; and
DOES 1 through 100, inclusive,

Defendants.

DONALD BENNETT, as an aggrieved
employee pursuant to the Private Attorneys
General Act (“PAGA”), on behalf of the
State of California and other aggrieved
employees,

Plaintiff,

vs.

CARLTON FORGE WORKS, a California
corporation; PRECISION CASTPARTS
CORP., an Oregon corporation; WYMAN-
GORDAN COMPANY, a Massachusetts
corporation; and DOES 1 through 10
inclusive,

Defendants.

Case No.: 21CMCV00141

Honorable Fumiko Wasserman
Department B

CLASS ACTION

**DECLARATION OF JAMES
PICARELLO IN SUPPORT OF
PLAINTIFFS’ MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement, Class
Counsel Fees Payment, Class Counsel
Litigation Expenses Payment, and Class
Representative Service Payments; Declarations
of Class Counsel (Joanna Ghosh and Raul
Perez); Declaration of Class Representative
(Alberto Gonzalez); Declaration of Settlement
Administrator (Jennifer Beliveau); and
[Proposed] Final Approval Order and Judgment
filed concurrently herewith]

Date: March 19, 2024
Time: 8:30 a.m.
Department: B

Gonzalez Action Filed: June 7, 2021
Bennett Action Filed: June 25, 2021
Picarello Action Filed: July 26, 2021
Trial Date: None Set

1 JAMES PICARELLO, individually, an on
2 behalf of other members of the general public
3 similarly situated;

4 Plaintiff,

5 vs.

6 CARLTON FORGE WORKS, INC., a
7 California corporation; and DOES 1 through
8 100, inclusive,

9 Defendants.

10 Raul Perez (SBN 174687)
11 Raul.Perez@capstonelawyers.com
12 **CAPSTONE LAW APC**
13 1875 Century Park East, Suite 1000
14 Los Angeles, California 90067
15 Telephone: (310) 556-4811
16 Facsimile: (310) 943-0396

17 Attorneys for Plaintiff Donald Bennett and the Class
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF JAMES PICARELLO

I, **James Picarello**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Carlton Forge Works, Inc. ("Carlton Forge") as an hourly-paid, non-exempt employee from approximately June 2005 to approximately May 2019. I decided to seek legal advice about my work experiences with Carlton Forge and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Carlton Forge was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class actions lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **7 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **8 hours** discussing my situation, complex wage-and-hour class actions in general, and what it meant to join the lawsuit and be a named plaintiff and class representative.

3. Since becoming involved in this matter, I have spent over **21 hours** meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with Carlton Forge, reviewing documents with my attorneys, answering questions, and providing guidance regarding the duties of hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Carlton Forge. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I

1 spent at least **22 additional hours** speaking with my attorneys about the case, identifying
2 potential witnesses, providing my attorneys with documents and information concerning the
3 case, and also describing policies, practices, and procedures of Carlton Forge.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I spent about **4 hours** reviewing the settlement
6 agreement and about **6 hours** asking questions and discussing the potential settlement with my
7 attorneys before signing the settlement agreement.

8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
10 obtained in this case, and as a class representative, I respectfully request that the Court award me
11 a Class Representative Service Payment in the amount of \$10,000.00 for my active participation
12 in this case. Taking into consideration the time that I have dedicated to this case, I believe that
13 this amount is reasonable.

14 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

15 8. I have not entered into any undisclosed agreements, nor have I received any
16 undisclosed compensation in this case. The only compensation I will receive is whatever amount
17 the Court awards as a service payment, as well as my share of the settlement as a class member.

18 I declare under penalty of perjury under the laws of the State of California that the
19 foregoing is true and correct.

20 Executed this ^{09/18/2023} ____ day of September 2023, at Torrance, California.

21 Electronically Signed  2023-09-19 01:14:02 UTC - 47:155.6.183
Hintex AssureSign® 37636a89-684f-4839-a0da-b082000005aL

22 James Picarello