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Attorneys for Plaintiff and the proposed class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO

HECTOR SANCHEZ, an individual, on behalf
of himself and others similarly situated

PLAINTIFF,

v.

J.R. PIERCE PLUMBING CO., INC. OF
SACRAMENTO; and DOES 1 thru 50,
inclusive,

DEFENDANTS.

CASE NO. 34-2021-00300960-CU-OE-GDS

[Case Assigned for All Purposes to Hon. Jill H.
Talley in Dept. 23]

**DECLARATION OF HECTOR
SANCHEZ IN SUPPORT OF FINAL
APPROVAL OF CLASS SETTLEMENT**

Date: June 7, 2024

Time: 9:00 AM

Dept.: 23

Complaint Filed: May 17, 2021

FAC Filed: July 22, 2021

SAC Filed: June 8, 2023

Trial Date: None Set

DECLARATION OF HECTOR SANCHEZ

I, Hector Sanchez, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant J.R. Pierce Plumbing Co., Inc. of Sacramento ("J.R. Pierce" or "Defendant") as an hourly employee.

3. I brought this lawsuit, on behalf of myself and all other Class Members, against Defendant because I believe that J.R. Pierce did not pay wages and/or overtime at the proper rate of compensation, provide compliant meal periods or meal period premium payments, failed to reimburse necessary business expenses, failed to issue accurate itemized wage statements, and failed to pay wages due at the time of separation, to me and other employees.

4. I understand that I am representing other employees and I believe that I am able to represent them well.

5. I first researched attorneys who are very experienced with these types of lawsuits. I specifically wanted to find attorneys who had experience handling these types of employment cases. Once retained, I compiled all of the relevant documents from my employment in my possession to assist my attorneys in litigating this case. I provided information to my attorneys regarding my employment with Defendant and the experience of others that I observed around me. I worked with my attorneys to develop the facts and legal claims in this lawsuit. The class action lawsuit was filed in May 2021.

6. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the Settlement as needed. Additional work in connection with this matter includes: staying in regular contact with my attorneys to discuss the status of the case; responding promptly to my attorneys' various communications regarding this matter; attending a full-day remote mediation in April 2023; and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of the

1 Class Members.

2 7. I estimate the total time spent in connection with this matter is approximately 25-
3 35 hours.

4 8. I believe that I have worked to actively represent the other Class Members and
5 represented their interests well. I have always kept the Class Members interests at heart in this
6 litigation.

7 9. I am prepared to continue assisting with this litigation and am committed to
8 achieving the best possible results for the Class.

9 10. I believe that the class action settlement obtained on behalf of the Class is fair and
10 reasonable in light of the issues involved in this case. As mentioned above, I reviewed and
11 discussed the Settlement Agreement with my attorneys and asked them questions about it to make
12 sure that I understood its terms and what it would mean for all of the class members.

13 11. I believe that I have fairly represented the absent Class and request that the Court
14 finally approve this settlement and confirm me as Class Representative.

15 12. I am not aware of any conflicts of interest that prevent me from being confirmed as
16 Class Representative in this Lawsuit. I am not related in any way to my attorneys or to any other
17 member of the firm that is representing me. I have no business dealings or other involvement
18 beyond this lawsuit and this representation. I have not been promised any money or inducement
19 to serve as Class Representative in this Lawsuit.

20 13. It is my opinion that the settlement agreement provides for a fair and adequate
21 enhancement for me as a Class Representative, in the amount of \$5,000.00. I believe that this is
22 fair and reasonable in light of all of the work that I have performed in my role as Class
23 Representative. As Class Representative, I have actively participated in all stages of the litigation,
24 as detailed above, and have always maintained the best interests of the Class while performing my
25 Class Representative duties.

26 14. It is also my opinion that the Class Representative enhancement is fair, reasonable,
27 and adequate because, in addition to the many hours spent participating in the prosecution of this
28

1 case, I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we
2 were unsuccessful in this Lawsuit. Likewise, I risk the potential stigma of being a Class
3 Representative in a class action labor dispute, which may affect my future employability.

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

6 Executed this 01 day of May, 2024 at Stockton, California.

DocuSigned by:

Hector Sanchez-Contreras

17298589CA604BC...

Hector Sanchez

(PROOF OF SERVICE)**[CCP 1013(a)(3)]****STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On May 10, 2024, I served all interested parties in this action the following documents described as: **DECLARATION OF HECTOR SANCHEZ IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

COOK BROWN LLP

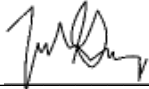
Carrie E. Bushman
cbushman@cookbrown.com
Linda Johnston
ljohnston@cookbrown.com
Zachary H. Rankin
zrankin@cookbrown.com
2407 J Street, Second Floor
Sacramento, CA 95816

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] BY ELECTRONIC MAIL TRANSMISSION: I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 10, 2024, at Los Angeles, California.



Taylor Gregg