

Edwin Aiwarzian (SBN 232943)
Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Yasmin Hosseini (SBN 326399)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

V. Andre Sherman (SBN 198684)
Sherman & Sherman, APC
751 North Fair Oaks Avenue, Suite 101
Pasadena, California 91103
Tel: (626) 517-3421

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

MIGUEL MONTOYA, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

AMERON INTERNATIONAL
CORPORATION, a Delaware corporation;
AMERON WATER TRANSMISSION
GROUP, LLC, an unknown limited liability
company; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: CIVDS1718377

Honorable David S. Cohn
Department S26

CLASS ACTION

**DECLARATION OF LECOSTEL
WILLIAMS IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Plaintiff's Motion for Preliminary Approval of
Class Action Settlement; Declaration of
Proposed Class Counsel (Joanna Ghosh);
Declarations of Proposed Class Representatives
(Miguel Montoya, Nicholas Lane, and Jose
Rosendo Camarillo); and [Proposed] Order
filed concurrently herewith]

Date: July 1, 2022
Time: 10:00 a.m.
Department: S26

Complaint Filed: September 20, 2017
Trial Date: None Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

1. I am over 18 years of age and a resident of California. I am the named plaintiff in *LeCostel Williams v. NOV Process & Flow Technologies US, Inc., et al.*, Superior Court of California for the County of Kern, Case No. BCV-20-102399 (“*Williams* Action”), and a proposed plaintiff in *Miguel Montoya v. Ameron International Corporation, et al.*, Superior Court of California for the County of San Bernardino, Case No. CIVDS1718377 (“*Montoya* Action”). 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 worked in an hourly-paid, non-exempt position from approximately June 2015 to approximately August 2017 for Ameron International Corporation, Ameron Water Transmission Group, LLC, Ameron Pole Products, LLC, NOV Process & Flow Technologies US, Inc., Containment Solutions, Inc., Containment Solutions Services, Inc., National Oilwell Varco, L.P., NOV, Inc., and NOW Oilfield Services, LLC (collectively, "Defendants"). I decided to seek legal advice about my work experiences with Defendants. I wanted to do whatever I could to make sure Defendants paid me and other employees what was owed to us. I investigated class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 5 hours. Thereafter, I consulted with the attorneys at Sherman & Sherman, APC for 5 hours discussing my situation, class action lawsuits in general, and what it means to be a class representative.

3. I have spent over 16 hours meeting with my attorneys regarding the matter and fulfilling my responsibilities as a named plaintiff and class representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they were updated with 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 spent at least 15 additional hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendants.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about 2 hours reviewing the settlement agreement and about 2 hours asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

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

7. I am not related to anyone associated with Sherman & Sherman, APC or Lawyers for Justice, PC.

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as an incentive award, as well as my individual settlement payment.

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

Executed this 18 day of May 2022, at Bakersfield, California.

Lu W-H

LeCostel Williams