

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 JOSE ROSENDO
CAMARILLO 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 LeCostel
Williams); 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

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1 to make sure that they were updated with my most current information and any additional
2 information that I had obtained.

3 4. Since becoming involved in this matter, I was available to answer any questions
4 my attorneys had, and available to speak and meet with my attorneys whenever they needed me.
5 I responded to them as quickly as possible and gave them as much information and identified as
6 many documents as I could. I spent at least 10 hours speaking with my attorneys about the cases,
7 identifying potential witnesses, providing my attorneys with documents and information
8 concerning the cases, and also describing policies, practices, and procedures of Defendants.

9 5. As far as the settlement is concerned, I was available to review documents and
10 answer any questions my attorneys had. I spent about 3 hours reviewing the settlement
11 agreement and about 2 hours asking questions and discussing the potential settlement with my
12 attorneys before signing the settlement agreement.

13 6. I believe that I have done everything that my attorneys have asked of me and have
14 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
15 and the State of California. I think my efforts helped to get the result obtained in this matter, and
16 as a class and PAGA representative, I respectfully request that the Court award me an incentive
17 award in the amount of \$10,000.00 for my active participation in this matter. Taking into
18 consideration the time that I have dedicated to this matter, I believe that this amount is
19 reasonable.

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

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

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

27 Executed this ____ day of April 2022, at West Covina, California.

28 4/20/2022

Electronically Signed 2022-04-20 21:07:44 UTC - 172.58.30.168

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Jose Rosendo Camarillo