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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 MIGUEL
MONTOYA 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
(Nicholas Lane, LeCostel Williams, 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

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1 4. As the case progressed, I was available to answer any questions my attorneys had,
2 and available to speak and meet with my attorneys whenever they needed me. I responded to
3 them as quickly as possible and gave them as much information and identified as many
4 documents as I could. I spent at least 11 additional hours speaking with my attorneys about the
5 case, identifying potential witnesses, providing my attorneys with documents and information
6 concerning the case, and also describing policies, practices, and procedures of Defendants.
7 During the discovery phase of the litigation, I spent approximately 10 additional hours reviewing
8 discovery requests, locating documents, and providing documents and responses to my attorneys.

9 5. On February 11, 2020 and March 10, 2020, I attended two full days of depositions
10 that lasted a total of approximately 12 hours. I spent at least 4 hours preparing for the depositions
11 and approximately 4 additional hours traveling to and from the depositions. After the
12 depositions, I spent at least 3 hours reviewing my testimony and discussing the contents of the
13 deposition transcripts with my attorneys.

14 6. As far as the settlement is concerned, I was available to review documents and
15 answer any questions my attorneys had. I spent about 2 hours reviewing the settlement
16 agreement and about 1 hour asking questions and discussing the potential settlement with my
17 attorneys before signing the settlement agreement.

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

24 8. I am not related to anyone associated with Lawyers *for* Justice, PC or Sherman &
25 Sherman, APC.

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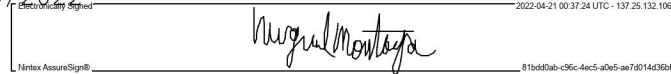
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1 9. I have not entered into any undisclosed agreements, nor have I received any
2 undisclosed compensation in this case. The only compensation I will receive is whatever amount
3 the Court awards as an incentive award, as well as my individual settlement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

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

6 Executed this _____ day of April 2022, at San Bernardino, California.

7 04/20/2022

8 The image shows a rectangular box containing a handwritten signature in cursive that reads "Miguel Montoya". Above the signature, the text "Electronically signed" is visible. To the right of the signature, the date and time "2022-04-21 00:37:24 UTC - 137.25.132.106" are printed. Below the signature, a long alphanumeric string "81bd80ab-c96c-4ec5-a0e5-aa7d014d36d1" is visible, along with the text "Nintex AssureSign®" on the left.

9 Miguel Montoya