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Attorneys for Plaintiff Leonides Trejo
and Proposed Class Counsel

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF EL DORADO

LEONIDES TREJO, on behalf of himself
and all “aggrieved employees” pursuant to
Labor Code § 2698 *et seq.*,

Plaintiffs,

v.

RESCUE ELECTRIC CORPORATION, a
California corporation, and DOES 1
through 10, inclusive,

Defendants.

CASE NO: 21CV0106

Assigned to the Hon. Dylan Sullivan, Dept. 9

CLASS ACTION

**DECLARATION OF LEONIDES TREJO IN
SUPPORT OF UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT AND FOR LEAVE
TO FILE SECOND AMENDED COMPLAINT**

Date: October 13, 2023

Time: 8:30 a.m.

Dept.: 9

Complaint Filed: November 4, 2021

I, LEONIDES TREJO, hereby declare and state as follows:

1. I am the named Plaintiff in this lawsuit against Defendant Rescue Electric Corporation (“Defendant”) and I submit this declaration in support of Plaintiff’s Unopposed Motion for Preliminary Approval of Class Action Settlement and for Leave to File Second Amended Complaint. I am a competent adult and worked for Defendant as a non-exempt

1 employee during the Class Period. I have personal knowledge of the facts set forth herein, and if
2 called as a witness to testify to them, I could and would do so competently.

3 2. I contacted my current attorneys when I questioned the employment practices of
4 Defendant prior to commencing this lawsuit. I accepted the opportunity to act as a Class
5 Representative in a class action on behalf of other employees of Defendant who I believed were
6 being subjected to labor law violations. Although presented with the opportunity, I did not to
7 pursue this case on an individual basis and instead did so as a class action so that I could help
8 other employees recover for what I believed were Defendant's illegal practices.

9 3. Specifically, I questioned Defendant's policies of failing to pay all wages, failing
10 to provide compliant meal and rest periods, failing to timely compensate employees, failing to
11 reimburse expenses, and issuing its employees incorrect paystubs. Through many discussions
12 with my lawyers, I learned these may be illegal practices and Defendant's employees might have
13 recourse for all Class Members and Aggrieved Employees.

14 4. By bringing this lawsuit, and throughout its course, I have put the interests of the
15 class ahead of my own. I understood that I could possibly earn a small enhancement payment if
16 this case resolved itself favorably, but always knew that I could also be responsible for paying
17 Defendant's attorneys' fees and costs if it did not. My goal in bringing this lawsuit was to obtain
18 a recovery on behalf of the class, and even more importantly, to put an end to what I believed
19 were illegal practices on the part of Defendant. I believe I have achieved both through this
20 lawsuit and settlement.

21 5. I am very happy about the results of this litigation. I am satisfied that Defendant is
22 compensating class members for unpaid wages, expenses, penalties, and interest that I believe we
23 are due.

24 6. At the onset of this case, I spent time through numerous phone calls with several
25 of my attorneys explaining what I understood to be the policies and procedures of Defendant and
26 how they were applied to me and others I worked with. During the course of this litigation, up
27 through and following the settlement process, I kept actively involved with its status, tracking the
28 status of the case and participating as much as possible. I assisted and consulted with my

1 attorneys throughout the litigation, provided relevant information, identified witnesses, and
2 helped during an all-day mediation.

3 7. While I have not maintained detailed time records of my activities in connection
4 with this litigation, I believe that have spent a total of approximately 20 hours assisting my
5 attorneys with the preparation of this case, and doing work and analysis independent from my
6 attorneys both before and during this case, including conducting an independent investigation of
7 the facts.

8 8. Before this litigation commenced, and throughout its course, I have spent
9 approximately 10 or more hours gathering, organizing, and reviewing documents and information
10 for this lawsuit. I sifted through many of my own documents and reviewed information produced
11 by Defendant as part of this case.

12 9. I have communicated with my attorneys several times per month to track my
13 case's status. I have taken an active involvement in this matter throughout its course.

14 10. This lawsuit will almost certainly result in reputational harm to me. There is a
15 stigma associated with suing anyone, let alone your former employer. I will probably be
16 adversely affected when it comes to obtaining future employment – employers who learn that I
17 sued Defendant in a class action will likely avoid hiring me.

18 11. I do not believe that I have any conflicts with other members of the class. My
19 interests in bringing this lawsuit – for Defendant to change its labor practices going forward and
20 to compensate current and former employees – are the same as those of all other class members.

21 I declare, under penalty of perjury, under the laws of the State of California, that the
22 foregoing is true and correct. Executed this 3rd^h day of August, 2023 at Fairfield, California.

23
24 *Leonides M Trejo*

25 _____
LEONIDES TREJO

Title	Signature for Declaration
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