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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CRUZ PEREZ JR., individually, and on
 behalf of other members of the general
 public similarly situated and on behalf
 of other aggrieved employees pursuant
 to the California Private Attorneys
 General Act;

Plaintiff,

vs.

BODYCOTE THERMAL
 PROCESSING, INC., an unknown
 business entity; and DOES 1 through
 100, inclusive,

Defendants.

Case No.: 2:22-cv-00145-RAO

Honorable Rozella A. Oliver
 Courtroom 590

**DECLARATION OF CRUZ PEREZ JR.
 IN SUPPORT OF PLAINTIFF'S
 MOTION FOR PRELIMINARY
 APPROVAL OF CLASS ACTION
 SETTLEMENT**

[Notice of Motion and Motion for
 Preliminary Approval of Class Action
 Settlement; Declaration of Proposed Class
 Counsel (Selena Matavosian); and
 [Proposed] Order filed concurrently
 herewith]

Date: January 10, 2024
 Time: 10:00 a.m.
 Courtroom: 590

Complaint Filed: November 17, 2021
 FAC Filed: February 18, 2022
 Jury Trial Date: None Set

DECLARATION OF CRUZ PEREZ JR.

I, Cruz Perez Jr., hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case. 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 have been employed by Bodycote Thermal Processing, Inc. ("Bodycote") in an hourly-paid, non-exempt position from approximately September 2019 to approximately September 2020. I decided to seek legal advice about my work experiences with Bodycote. I contacted Lawyers for Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure that Bodycote was held accountable for not paying its non-exempt, hourly-paid employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **5 hours**. Afterwards, I consulted with the attorneys at Lawyers for Justice, PC for **6 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to commence the lawsuit and be a named plaintiff, class representative, and eventually PAGA representative.

3. I have spent over **10 hours** meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with Bodycote, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Bodycote. I routinely checked in with my attorneys and their staff to make sure they had all of my most current information and any additional information that I had obtained.

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4. As the case progressed, 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 **8 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 Bodycote.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about **3 hours** reviewing the settlement documents and about **2 hours** asking questions and discussing the 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 have helped to obtain the result in this case, and as a class representative, I respectfully request that the Court award me an enhancement payment in the amount of \$5,000.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

7. I am not related to anyone associated with Lawyers *for* Justice, PC.

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement payment, as well as my share of the settlement fund as a class member.

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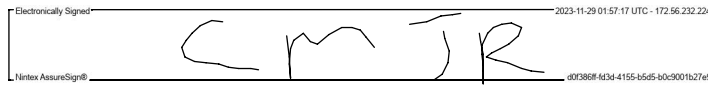
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1 I declare under penalty of perjury under the laws of the State of California
2 that the foregoing is true and correct.

3 Executed this ^{11/28/2023} day of November 2023, at Artesia, California.

4 The signature is a handwritten-style "Cruz Perez Jr." enclosed in a rectangular box. The box contains the text "Electronically Signed" at the top left, "2023-11-29 01:57:17 UTC -172.56.232.224" at the top right, "Nintex AssureSign®" at the bottom left, and "000368f-6d34-4155-b5d5-b0c9001b27e0" at the bottom right.

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