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Attorneys for Plaintiff Randall Hord
and Proposed Class Counsel

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KERN

ARTURO GONZALEZ, on behalf of
himself and all "aggrieved employees"
pursuant to Labor Code § 2698 *et seq.*,

Plaintiffs,

v.

JTI ELECTRICAL &
INSTRUMENTATION,
LLC, a Delaware limited liability company,
and DOES 1 through 10, inclusive,

Defendants.

CASE NO: BCV-21-102905

Assigned to the Hon. Thomas S. Clark, Dept. 17

**DECLARATION OF RANDALL HORD IN
SUPPORT OF UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT AND LEAVE TO
FILE FIRST AMENDED COMPLAINT**

DATE: October 10, 2023

TIME: 8:30 a.m.

DEPT.: 17

Action Filed: December 13, 2021

1 I, RANDALL HORD, hereby declare and state as follows:

2 1. I am a named Plaintiff in this lawsuit and in a related class action lawsuit against
3 Defendant JTI Electrical & Instrumentation, LLC ("Defendant") and I submit this declaration in
4 support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement. I
5 am a competent adult and worked for Defendant as a non-exempt employee in Kern County during
6 the relevant time period. I have personal knowledge of the facts set forth herein, and if called as
7 a witness to testify to them, I could and would do so competently.

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

14 3. Specifically, I questioned Defendant's policies of failing to pay all wages due,
15 failing to provide all meal and rest periods, failing to reimburse for necessary expenditures, failing
16 to timely compensate employees upon separation, and issuing its employees deficient wage
17 statements. Through many discussions with my lawyers, I learned these may be illegal practices
18 and Defendant's employees might have recourse for them.

19 4. By bringing this lawsuit, and throughout its course, I have put the interests of the
20 class ahead of my own. I understood that I could possibly earn a small enhancement payment if
21 this case resolved itself favorably, but always knew that I could also be responsible for paying
22 Defendant's attorneys' fees and costs if it did not. My goal in bringing this lawsuit was to obtain
23 a recovery on behalf of the class, and even more importantly, to put an end to what I believed were
24 illegal practices on the part of Defendant. I believe I have achieved both through this lawsuit and
25 settlement.
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1 5. I am very happy about the results of this litigation. I am satisfied that Defendant is
2 compensating class members for premium wages for missed meal and rest periods, penalties, and
3 interest that I believe we are due.

4 6. At the onset of this case, I spent time through numerous phone calls with several of
5 my attorneys explaining what I understood to be the policies and procedures of Defendant and
6 how they were applied to me and others I worked with. I also provided counsel with numerous
7 documents as well as the contact information of other employees who they could contact to verify
8 the facts that I provided them. During the course of this litigation, up through and following the
9 settlement process, I kept actively involved with its status, tracking the status of the case and
10 participating as much as possible.

11 7. While I have not maintained detailed time records of my activities in connection
12 with this litigation, I believe that have spent a total of approximately 30 hours assisting my
13 attorneys with the preparation of this case, and doing work and analysis independent from my
14 attorneys both before and during this case, including conducting an independent investigation of
15 the facts, review payroll and other records, looking for emails and other documentation
16 substantiating Defendant's policies and procedures, and reaching out to other former employees.

17 8. Before this litigation commenced, and throughout its course, I have spent
18 approximately 5 or more hours gathering, organizing, and reviewing documents and information
19 for this lawsuit. I sifted through many of my own documents and sent both hard copies and
20 electronic documents to my counsel. I also reviewed information produced by Defendant as part
21 of this case and provided comments to counsel on the Defendant's policies and procedures and the
22 document produced by Defendant.

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

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

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

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

8 Executed on this 29 day of June, 2023 at Bakersfield, California.

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11 RANDALL HORD
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