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21 Attorneys for Plaintiff Randall Hord
22 and Proposed Class Counsel

23
24 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
25
26 **FOR THE COUNTY OF KERN**

27 ARTURO GONZALEZ, on behalf of
28 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 JAMES KAWAHITO IN
SUPPORT OF 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

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1. I am an adult resident of the State of California. I am a shareholder at the law firm of Kawahito Law Group APC (“KLG” or “Class Counsel”). KLG represents Plaintiff Jeffrey Randall Hord (“Plaintiff”) in this action. If called as a witness, I would testify truthfully to the matters set forth herein. All of the matters set forth in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

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- *Drago v. Be, LLC, et al.*, Los Angeles County Superior Court;
- *DuFour v. Be, LLC*, United States District Court for the Northern District of California;
- *Duncan v. 1038, Inc.*, Los Angeles County Superior Court;
- *Duncan v. Brink's Inc.*, Los Angeles County Superior Court;
- *Fitzgerald v. InformedRX*, Los Angeles County Superior Court;
- *Frank v. PHH*, Los Angeles County Superior Court;
- *Gamez v. Limo Four You*, Fresno County Superior Court;
- *Gomez v. Domulary Inc.*, Los Angeles County Superior Court;
- *Gravestock v. Abilene Motor Express*, United States District Court for the Central District of California;
- *Harrigan v. MobileOne LLC*, Sacramento County Superior Court;
- *Kloppsis v. Music Express, Inc.*, Los Angeles County Superior Court;
- *LeBrun v. LPS*, United States District Court for the Central District of California;
- *Macias v. Carl Karcher Enterprises, Inc.*, Santa Barbara Superior Court;
- *Maltezos v. Heartway America LLC*, Los Angeles County Superior Court;
- *Mirza v. McRoberts Security Services*, United States District Court for the Central District of California;
- *Musgraves v. KMart Corporation*, United States District Court for the Central District of California;
- *Rosas v. Choura*, Los Angeles County Superior Court;
- *Seidman v. Equable*, Los Angeles County Superior Court;
- *Simril v. TVI, Inc.*, United States District Court for the Northern District of California;
- *Smith v. Crossmark*, United States District Court for the Northern District of California;

- *Sumner v. Toys R Us, Inc.*, United States District Court for the Central District of California;
- *Vondersaar v. Starbucks*, United States District Court for the Central District of California;
- *Williams v. U.S. Bank*, United States District Court for the Central District of California;
- *Means v. Airgas*, United States District Court for the Central District of California; and
- *Neil v. Hanlees*, Contra Costa Superior Court.

4. Of the dozens of class actions that KLG, or its predecessor firm, has litigated or is currently litigating, more than half involve wage and hour issues under California and federal law. I have had an active role in litigating all these cases, often as the lead attorney on the matter. Based on this extensive experience, it is Class Counsel's opinion that this Settlement is fair, adequate, and reasonable in protecting and vindicating the rights of Class Members.

5. I graduated from Yale University in 1996 with a B.A. degree in Economics. I later graduated from UCLA Law School in 2004 as a member of the Order of the Coif and was an editor on the UCLA Law Review.

6. After law school, I clerked for the Honorable David Alan Ezra of the United States District Court for the District of Hawaii and worked as an attorney at the international law firms of Paul, Hastings, Janofsky & Walker LLP ("Paul Hastings") and Hunton & Williams LLP ("Hunton"). At both Paul Hastings and Hunton, I worked in the litigation departments and defended various complex commercial litigation matters including, but not limited to, numerous consumer and employment class actions.

7. I am in my nineteenth year of practice as an attorney. In addition to handling consumer, employment and civil rights class actions, I have litigated numerous cases in various fields of the law including, but not limited to, multimillion dollar cases in the areas of environmental litigation, trademark disputes, securities litigation, franchise disputes, contract and

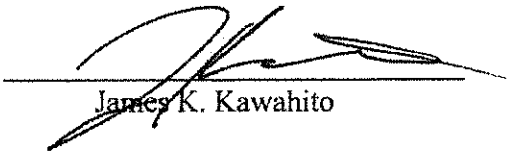
1 business disputes and trade secret litigation. I have represented an array of clients from large
2 institutional clients from Fortune 500 companies to professional mixed martial arts fighters.

3 8. I have tried cases in both state and federal court. In addition, I have successfully
4 handled multiple appeals before both the Ninth Circuit Court of Appeals as well as the California
5 Court of Appeal.

6 9. Through the years, I have routinely prosecuted class actions involving similar
7 claims as the ones litigated in this case.

8 I declare under penalty of perjury under the laws of California that the foregoing is true
9 and correct.

10 Executed on July 27, 2023 at Los Angeles, California.

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