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Attorneys for Plaintiff and the Proposed Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

NICK VASQUEZ, an individual, on behalf of
himself and others similarly situated

PLAINTIFF,

v.

TURBINE ENGINE COMPONENTS
TECHNOLOGIES CORPORATION; and
DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. 21STCV42670

[Case Assigned for All Purposes to Hon. Elaine
Lu in Dept. 9]

**DECLARATION OF NICK VASQUEZ IN
SUPPORT OF FINAL APPROVAL OF
CLASS SETTLEMENT**

Date: October 23, 2024
Time: 10:00 AM
Dept.: 9

Complaint Filed: November 19, 2021
Trial Date: None Set

DECLARATION OF NICK VASQUEZ

I, NICK VASQUEZ, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant TURBINE ENGINE COMPONENTS TECHNOLOGIES CORPORATION (“Turbine” or “Defendant”) as an hourly employee.

3. I brought this lawsuit, on behalf of myself and all other Class Members, against Defendant because I believe that Turbine did not provide compliant meal and rest periods, failed to pay vested vacations wages, failed to issue accurate itemized wage statements, and failed to pay all wages due at the time of resignation/termination from Defendant’s employ.

4. I understand that I am representing other employees and I believe that I am able to represent them well.

5. I first researched attorneys who are very experienced with these types of complex employment lawsuits. Once I identified Counsel and retained them, I began to compile all relevant documents from my employment to assist my attorneys in initiating this case. Throughout the case, I have worked with my attorneys to develop the facts and legal claims in this lawsuit. The lawsuit was filed in November 2021.

6. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the Settlement as needed. Additional work in connection with this matter includes staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my attorneys’ various communications regarding this matter, making myself available for a full-day mediation on January 24, 2023, and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of the Class Members.

7. I estimate the total time spent in connection with this matter is approximately 25-30 hours.

8. I believe that I have worked to actively represent the other Class Members and their interests.

9. I have always kept the Class Members interests at heart in this litigation.

10. I am prepared to continue assisting with this litigation and am committed to achieving the best possible results for the Class.

11. I believe that the class action settlement obtained on behalf of the Class is fair and reasonable in light of the issues involved in this case. As mentioned above, I reviewed and discussed the Settlement Agreement with my attorneys and asked them questions about it to ensure that I understood its terms and what it would mean for all of the class members.

12. I believe that I have fairly represented the absent Class and request that the Court finally approve this settlement and confirm me as Class Representative.

13. I am not aware of any conflicts of interest that prevent me from being confirmed as Class Representative in this Lawsuit. I am not related in any way to my attorneys or to any other member of the firm that is representing me. I have no business dealings or other involvement beyond this lawsuit and this representation. I have not been promised any money or inducement to serve as Class Representative in this Lawsuit.

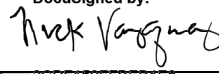
14. It is my opinion that the settlement agreement provides for a fair and adequate enhancement for me as a Class Representative, in the amount of \$5,000.00. I believe that this is fair and reasonable in light of all of the work that I have performed in my role as Class Representative. As Class Representative, I have actively participated in all stages of the litigation, as detailed above, and have always maintained the best interests of the Class while performing my Class Representative duties.

15. It is also my opinion that the Class Representative enhancement is fair, reasonable, and adequate because, in addition to the many hours spent participating in the prosecution of this case, I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we were unsuccessful in this Lawsuit. Likewise, by stepping forward and bringing this lawsuit I risk the potential stigma of being a Class Representative in a class action labor dispute, which may

1 affect my future employability.

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

4 Executed this 19th, day of September, 2024 at La Puente
5 California. (City)

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NICK VASQUEZ

(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On September 24, 2024, I served all interested parties in this action the following documents described as: **DECLARATION OF NICK VASQUEZ IN SUPPORT OF FINAL APPROVAL OF CLASS ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

SEYFARTH SHAW LLP

Andrew M. Paley

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Jill A. Porcaro

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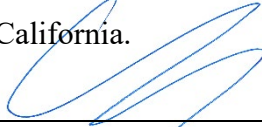
Los Angeles, CA 90010-2513

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL THROUGH CASE ANYWHERE): On interested parties set forth on the attached service list.

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 24, 2024, at Encino, California.



Michelle Tanzer