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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 the Hon.
Yvette M. Palazuelos in Dept. 9]

**DECLARATION OF NICK VASQUEZ IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS SETTLEMENT**

Date: July 5, 2023

Time: 10:00 a.m.

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 matter of *NICK VASQUEZ, an individual, on behalf of himself and others similarly situated v. TURBINE ENGINE COMPONENTS TECHNOLOGIES CORPORATION*; and DOES 1 thru 50, inclusive, Los Angeles County Superior Court, Case No. 21STCV42670. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto. I am making this sworn declaration in support of my claims and the claim of my co-workers, and in support of my qualifications as named Plaintiff. If called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I worked as a material manager for TURBINE ENGINE COMPONENTS TECHNOLOGIES CORPORATION ("Defendant" or "Turbine") from approximately 1979 to 2020. I was a non-exempt employee who was paid on an hourly basis.

3. Before filing this action, in November 19, 2021, I researched and identified Counsel that I believed could best represent the interests of the Class Members. My goal was to identify Counsel with experience in employment class actions. I believe that I found competent legal Counsel to handle this matter who regularly handles these types of cases.

4. Once retained, I assisted the attorneys with investigation and gathering of information including discussing my work experience and the experience of others that I observed while working for Turbine and providing all relevant employment documents in my possession.

5. I have always shared all information regarding my insights and experience working for Defendant and their practices and procedures to help the Class obtain a favorable settlement.

6. I believe that the other Class Members and I had meal period claims for not being able to take all compliant meal and rest breaks, vested vacation wage claims, inaccurate itemized wage statement claims, and waiting time penalties, among other allegations. I understand that by signing the full release in this matter, I lose the right to pursue these claims any further.

7. I understand that I have agreed to act as a Class Representative and that I represent all other workers who are similarly situated. I understand that I have a responsibility to act in the

1 best interests of all other Class Members. I believe that I have put the Class Members interests
2 ahead of my own interests at all times during this litigation.

3 8. I also am aware and understand that I have agreed to sign a broader release of the
4 claims than the release applicable to the Class Members in reaching the settlement.

5 9. Throughout the entirety of this litigation, I have maintained regular contact with
6 Class Counsel and assisted in any way possible by providing information and making myself
7 available as needed.

8 10. I was aware that by helping to initiate this lawsuit, my name would become known
9 and it was possible that my involvement in this matter could make it more difficult for me to obtain
10 employment. Regardless, I believed it was important to proceed with this matter on my behalf and
11 on behalf of all others who were subject to the same problems during their employment with
12 Turbine.

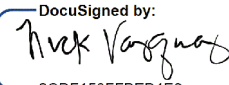
13 11. Based upon my participation in this case, I understand the merits of this settlement
14 and I strongly support the settlement and believe it is fair and reasonable, and in the best interest
15 of the class. I believe that a \$650,000.00 settlement is fair and reasonable, and this Settlement will
16 benefit the Class Members.

17 12. It is my opinion that a fair and adequate Plaintiff enhancement payment for me as
18 a named Plaintiff is \$5,000.00. I believe that it is fair and reasonable in view of all the work I have
19 performed in my role as a named Plaintiff.

20 13. As named Plaintiff, I actively participated in all stages of the litigation as detailed
21 above and have always maintained the best interest of the Class while performing my named
22 Plaintiff duties.

23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct. Executed this 08 day of June, 2023
25 at La puente, California.

26 (City)

27 DocuSigned by:
28 
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NICK VASQUEZ
Declarant

(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 11, 2023, I served all interested parties in this action the following documents described as: **DECLARATION OF NICK VASQUEZ IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY 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 apaley@seyfarth.com Jill A. Porcaro jporcaro@seyfarth.com Angelina Evans aevans@seyfarth.com 2029 Century Park East, Suite 3500 Los Angeles, CA 90067-3021	ABRAMSON LABOR GROUP William Zev Abramson wza@abramsonlabor.com 11846 Ventura Blvd., Suite 100 Studio City, CA 91604
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[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 11, 2023, at Woodland Hills, California.



Michelle Tanzer