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Attorneys for Plaintiff and all aggrieved employees

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

ERIC HERRERA, an individual, on behalf of
the State of California, as a private attorney
general,

PLAINTIFF,

v.

RCI ELECTRIC, INC.; and DOES 1 thru 50,
inclusive,

DEFENDANTS.

Case No. 34-2021-00311447-CU-OE-GDS

[Case Assigned for All Purposes to Hon. Jill H.
Talley in Dept. 23]

**DECLARATION OF ERIC HERRERA IN
SUPPORT OF MOTION FOR
APPROVAL OF REPRESENTATIVE
ACTION SETTLEMENT**

Date: September 20, 2024
Time: 9:00 AM
Dept.: 23

Complaint Filed: November 10, 2021
Trial Date: None Set

Reservation No. #A-311447-002

DECLARATION OF ERIC HERRERA

I, ERIC HERRERA, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and a named Plaintiff in the matter of ERIC HERRERA, on behalf of the State of California, as a private attorney general, v. RCI ELECTRIC, INC.; and DOES 1 thru 50, inclusive, Sacramento County Superior Court, Case No. 34-2021-00311447-CU-OE-GDS. 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 claim and the claims of my co-workers, and in support of my qualifications as the 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 an employee of RCI ELECTRIC, INC. ("Defendant").

3. As an employee of Defendants, I contend that I regularly failed to compliant rest periods, failed to be reimbursed for business-related expenses, and failed to receive accurate itemized wage statements. Additionally, I was not paid all wages at the time of my termination/resignation.

4. I have spent significant time throughout this class action working with Class Counsel. Before entering the action on November 10, 2021, I researched and identified Counsel that I believed had extensive experience with these types of employment claims and could best represent the interests of the aggrieved employees. I also assisted the attorneys with investigation and gathering of information including discussing my work experience and the experience of others that I had observed while working for Defendants and provided all relevant employment documents in my possession. In addition, I made myself available to attend a full-day remote mediation on May 10, 2024. In connection with the mediation, I participated in discussions with PAGA Counsel and shared my knowledge and insights in order to help obtain a favorable settlement.

5. I also litigated my individual case in arbitration and agreed to come back to court to represent the other aggrieved employees.

8. Based upon my participation in this case, I understand the merits of this settlement and I strongly support the settlement and believe it is fair and reasonable, and in the best interest of the aggrieved employees. I believe this Settlement will benefit the aggrieved employees.

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

DocuSigned by:

Eric Herrera

(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 July 8, 2024, I served all interested parties in this action the following documents described as: **DECLARATION OF ERIC HERRERA IN SUPPORT OF MOTION FOR APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

PALMER KAZANJIAN WOHL HODSON LLP

Larry M. Kazanjian

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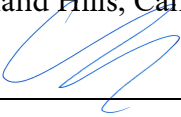
Attorneys for Defendant

[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 TRANSMISSION): I caused the document to be sent to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[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 July 8, 2024, at Woodland Hills, California.



Michelle Tanzer