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

ROCIO J. MAYA GONZZALEZ, individually,
and on behalf of all others similarly situated,

Plaintiff,

vs.

NATIONAL ENGINEERING AND
CONSULTING GROUP, INC., a California
corporation; and DOES 1 through 10, inclusive,

Defendants

Case No.: 21STCV40584

CLASS AND REPRESENTATIVE ACTION

Assigned for all purposes to the Honorable
Kenneth R. Freeman, Department 14

**DECLARATION OF ROCIO J. MAYA
GONZZALEZ IN SUPPORT OF APPROVAL
OF CLASS AND PAGA ACTION
SETTLEMENT**

Action Filed: November 4, 2021
Trial Date: Not Set

1 **DECLARATION OF ROCIO J. MAYA GONZZALEZ**

2 I, Rocio J. Maya Gonzzalez, declare:

3 1. I am the named Plaintiff in this case. I am a former employee of National
4 Engineering and Consulting Group, Inc. (“Defendant”). As such, I have personal knowledge of,
5 or am informed and believe, the following facts herein stated. If called as a witness, I could and
6 would testify competently to the following:

7 **BACKGROUND OF EMPLOYMENT**

8 2. I worked for Defendant as a Site Monitor from July 2020 to November 2020.
9 Throughout my employment, I typically worked Monday to Friday, from 7 a.m. to 5 p.m.

10 3. During my employment with Defendant, I realized that its wage and hour
11 practices placed employees, including me, at a disadvantage. For instance, I noticed I was
12 misclassified as exempt from overtime, and I was not trained or provided any information
13 relating to meal breaks and rest periods and was not allowed to leave the worksites during
14 workhours. Additionally, I was required to pay expenses that were in direct discharge of my
15 duties for Defendant without reimbursement.

16 4. I believe that Defendant’s wage and hour practices that affected me also affected all
17 of its employees in the position of “Staff Geologist” or “Technician.”

18 **COMMONALITY, TYPICALITY, AND ADEQUACY**

19 5. I was employed by Defendant as an exempt employee during the Class Period.
20 Accordingly, I brought this class action on behalf of all other employees who are also, or were
21 at some point, classified as exempt in the position of “Staff Geologist” or “Technician” during
22 their employment with Defendant. I believe my alleged claims in this case impacted not only
23 me but the entire class.

24 6. I believe that I have no conflicts of interest with other class members and have
25 agreed to place Class interests above my own.

26 **SERVICE AS A CLASS REPRESENTATIVE**

27 7. I believe that were it not for my stepping forward and taking on the duties of
28 protecting the interests of other employees, it is likely that the interests of the class would neither

1 have been prosecuted, nor benefited. To my knowledge, other than the litigation encompassed by
2 this proposed Settlement, there is no other litigation, on a class or individual basis, concerning the
3 claims in this lawsuit, nor has Defendant pointed to any.

4 8. I have assumed some long-lasting risk in prosecuting this case. Because it is so easy
5 to search for information online these days, I will face an increased risk that future employers will
6 discover information about this lawsuit online and have a negative reaction to learning that I sued an
7 employer. This may make it harder for me to obtain future employment or change jobs for a better
8 opportunity.

9 9. I have devoted a substantial amount of my time during this litigation to ensure a
10 fair result for the employee class. This involved ongoing communications and participation
11 with my counsel.

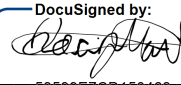
12 10. My participation began with bringing certain issues that are involved in this
13 matter to my counsel's attention and explaining the factual background that was used to
14 prosecute the claims in this case. I also provided relevant documents to my counsel, and explained
15 those documents and related facts to my counsel to assist them in their review.

16 11. After the mediation, a long-form settlement agreement was negotiated, which I
17 reviewed with my attorneys..

18 12. In sum, I believe I have provided between 30-35 hours of my time during the
19 course of this litigation to protect the best interests of the class and ensure a good outcome for
20 the class.

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

23 Executed on April ¹¹, 2023, at Coos Bay, Oregon.

24 DocuSigned by:

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25 Rocio J. Maya Gonzzalez