

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Alexandra Rose (SBN 3294407)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

ANDRES CASAS, individually, and on
behalf of other members of the general
public similarly situated;

Plaintiff,

vs.

MYERS POWER PRODUCTS, INC.,
an unknown business entity; and DOES
1 through 100, inclusive,

Defendants.

Case No.: CIVDS1920109

Honorable David S. Cohn
Department S26

CLASS ACTION

**DECLARATION OF ANDRES CASAS IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

[Notice of Motion and Motion for Preliminary
Approval of Class Action Settlement;
Declaration of Class Counsel (Alexandra
Rose); and [Proposed] Order filed concurrently
herewith]

Date: March 1, 2023
Time: 10:00 a.m.
Department: S26

Complaint Filed: July 10, 2019
FAC Filed: December 20, 2019
Trial Date: None Set

DECLARATION OF ANDRES CASAS

I, **Andres Casas**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case, and I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendant Myers Power Products, Inc. (“Myers”) from approximately February 2017 to approximately February 2018 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences at Myers and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Myers paid me and other employees what was owed to us and stopped its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **9 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **8 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the California Private Attorneys General Act (“PAGA”) in general, and what it meant to be named plaintiff and class representative.

3. I have spent over **23 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which has included gathering documents concerning my employment with Myers, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of non-exempt, hourly-paid employees, and helping develop a strategy as to what documents and information to obtain from Myers. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and to provide them with any additional information that I had obtained.

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4. I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could. I spent at least **21 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Myers.

5. As far as the settlement is concerned, I was available to review documents and answer any question my attorneys had. I spent about **3 hours** reviewing the settlement agreement and about **3 hours** asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case, and as a class representative, I respectfully request that the Court award me an enhancement award in the amount of \$10,000.000 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

7. I am not related to anyone associated with Lawyers *for* Justice, PC.

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement award, as well as my share of the settlement as a class member.

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

Executed this ^{11/12/} day of November 2022, at Rochester, New York.

Electronically Signed 2022-11-12 15:53:08 UTC - 174.208.37.224
Nintex AssureSign® 7605ec8-b6da-493e-9ca6-af490120f6cb

Andres Casas