

AEGIS LAW FIRM, PC

KASHIF HAQUE, State Bar No. 218672

SAMUEL A. WONG, State Bar No. 217104

JESSICA L. CAMPBELL, State Bar No. 280626

KRISTY R. CONNOLLY, State Bar No. 328477

kconnolly@aegislawfirm.com

9811 Irvine Center Drive, Suite 100

Irvine, California 92618

Telephone: (949) 379-6250

Facsimile: (949) 379-6251

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP

Norman B. Blumenthal (State Bar #068687)

Kyle R. Nordrehaug (State Bar #205975)

Aparajit Bhowmik (State Bar #248066)

Nicholas J. De Blouw (State Bar #280922)

2255 Calle Clara La Jolla, CA 92037

Telephone: (858)551-1223

Facsimile: (858) 551-1232

Website: www.bamlawca.com

Attorneys for Plaintiffs Maurice Keys and Jose Juan Noyola,
individually, and on behalf of all others similarly situated.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

MAURICE KEYS and JOSE JUAN
NOYOLA, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

USA WASTE OF CALIFORNIA, INC.;
STAFFING NETWORK HOLDINGS,
L.L.C.; and DOES 3 through 20, inclusive,

Defendants.

Case No. 30-2022-01244825-CU-OE-CXC

Assigned for All Purposes to:
Judge Randall J. Sherman
Dept. CX-105

**PLAINTIFF JOSE JUAN NOYOLA'S
DECLARATION IN SUPPORT OF
PLAINTIFFS' MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

Date:
Time:
Dept: CX-105

1 I, Jose Juan Noyola, declare:

2 1. I am a competent adult, I have personal knowledge of the facts in this declaration,
3 and I am making this declaration on behalf of myself, as a named plaintiff, and in support of the
4 Motion to Approve Private Attorneys General Act Settlement.

5 2. I worked in California as a non-exempt employee of Defendants Defendant Waste
6 Management National Services, Inc. and Staffing Network Holdings, L.L.C. ("Defendants")
7 from approximately March 2021 to June 2021.

8 3. I retained my attorneys who are experienced in PAGA representative action
9 litigation and claims against employers for violations of the California Labor Code. I have no
10 personal relationship or family ties to my attorneys or any officer of the Court. I am not aware of
11 having any actual or potential conflicts of interest with another aggrieved employee in this case
12 nor am I aware of having any actual or potential conflicts of interest with Phoenix Settlement
13 Administrators, the settlement administrator.

14 4. I was subjected to Defendants' policies and practices that have been alleged as
15 unlawful in the Complaint and the PAGA notice sent to the Labor and Workforce Development
16 Agency. For example, I often did not receive compliant meal and rest breaks which were late,
17 interrupted or missed entirely. I also did not receive all the meal and rest break premiums I was
18 entitled to and when I did receive premium payments they were often an incorrect amount.
19 Additionally, I was required to use my personal cellular phone for company business without
20 reimbursement by Defendants. I was also required to work off the clock at times, after hours for
21 example, but I was not paid any wages for this time I worked for the company.

22 5. In bringing this case for myself, the State of California, and the other employees,
23 I understood a lot of work would be required and I was willing to, and did, do the work to keep
24 the case moving forward. For instance, before the complaint was filed I spoke to my attorneys
25 several times and discussed how Defendant implemented its company policies and procedures. I
26 also assisted my attorneys in their investigation into my claims by providing them documents
27 and answering their questions. I reviewed the complaint before it was filed and after it was filed
28 I was given access to an electronic file sharing program that alerted me via email when
important documents were filed so that I could review them and keep up with the developments

1 in the case. I was informed that the Defendants had the right to take my deposition, and that the
2 preparation and deposition itself could take multiple days. Although my deposition was not
3 taken, I feel I would have been adequately prepared and comfortable to give testimony on my
4 experiences.

5 6. My attorneys explained to me the risks and benefits of bringing a representative
6 action. I understood that I took on the risk, both professionally and financially, in pursuing the
7 case as a representative PAGA action.

8 7. A mediation took place on April 26, 2024 with Steven J. Serratore, Esq., a well-
9 respected and experienced mediator. The mediation resulted in an agreement to settle the action.
10 I communicated with my attorneys regarding the terms of the settlement which was reached
11 between the parties and understood that the recovery in this case was for the benefit of my fellow
12 coworkers, not just for me, and therefore wanted the best possible result to be obtained for the
13 aggrieved employees.

14 8. I have been actively involved with this lawsuit. Although I did not keep time
15 records, I was in regular contact with my attorneys, reviewed court filings, and spent a
16 significant amount of time on the issues presented during the lawsuit and in the settlement
17 process. I estimate that I spent approximately 30-40 hours working on this case up until this
18 point.

19 9. I reviewed the final PAGA Settlement Agreement and I believe it is fair and
20 reasonable given the facts of the case.

21 10. I believe the \$10,000 Service Award I have requested is fair compensation for my
22 efforts in support of this action and the risks I undertook.

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

25 Executed on 02/07/2025, at Anaheim, Ca.
26 (city, state)

27 Jose Noyola
28 Jose Noyola (Feb 7, 2025 18:18 PST)

Jose Juan Noyola

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28