

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
DIVERSITY LAW GROUP, P.C.
515 South Figueroa Street, Suite 1250
Los Angeles, California 90071
Telephone: (213) 488-6555
Facsimile (213) 488-6554

Attorneys for Plaintiff and the Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

GZIM KOVACEVIC, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

PURE WAFER, INC, a Delaware corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 22CV401779

**DECLARATION OF GZIM
KOVACEVIC IN SUPPORT OF
PLAINTIFF’S MOTION TO APPROVE
SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE
ATTORNEYS GENERAL ACT**

Date: October 9, 2024
Time: 1:30 p.m.
Dept.: 19

Complaint Filed: August 4, 2022
Trial Date: None

1 I, Gzim Kovacevic, hereby declare and state as follows:

2 1. I am an individual over the age of 18. I am the named plaintiff in the above-
3 reference action. I have personal knowledge of the facts set forth below and if called to testify I
4 could and would do so competently.

5 2. I previously worked for Pure Wafer, Inc. (the "Company") during the
6 approximate period of March 8, 2019 to February 2, 2022. For the duration of my employment, I
7 was a non-exempt employee.

8 3. Beginning during the pandemic, I was required to submit to COVID-19
9 screenings, such as temperature checks and questionnaires, prior to the start of each shift. I did
10 not receive the payment of wages for time spent completing the screening activities.

11 4. Additionally, due to the demand of my job, I routinely worked through my meal
12 and/or rest periods. On the occasions where I was able to take a meal/rest period, my breaks were
13 frequently interrupted and shortened. I did not receive the payment of premium compensation for
14 such missed or shortened breaks.

15 5. As a result of the non-payment of wages and meal/rest period premiums, I
16 received wage statements that failed to accurately identify the number of hours worked, as well
17 as all of the wages owed for unpaid minimum/overtime wages and meal/rest period premiums.

18 6. I filed this lawsuit because I was concerned that I was not being paid properly for
19 all the hours that I worked. By bringing a representative action lawsuit, I hoped that I might be
20 able to change the Company's policies to better protect the working conditions of other workers.

21 7. However, I did not make the decision to file a representative action lightly. I was
22 concerned by the attention that a lawsuit would attract in the workplace and the reputational
23 harm that may result, including the perception that I am difficult to work with. Although the
24 lawsuit is justified, my current or prospective employer might find out that I sued the Company,
25 and there is a risk of facing retaliation and strained relationships with colleagues and supervisors.
26 Nevertheless, I felt that important rights were at stake that hurt everyone, and something ought to
27 be done about it.

28 8. I respectfully request that the Court award a \$7,500 enhancement payment. I have

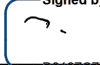
done my best to represent the interests of the employees that are part of this settlement. I have actively contributed to this case. This includes: (1) participating in numerous telephonic meetings with my attorneys and their staff; (2) reviewing and signing the PAGA Notice; (3) reviewing the Complaint; (4) providing my attorneys with information and documents; and (5) reviewing and executing the settlement agreement.

9. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive accomplishment and understand that other people will benefit because of the actions that I have taken.

10. I do not believe I have any interests that are adverse to the other employees that are part of the PAGA settlement.

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

Executed on September 4, 2024, at SUNNYVALE, California.

Signed by:

 D8127C77697849D
 Gzim Kovacevic