

JAMIE SERB (SBN 289601)
jamie@crosnerlegal.com
MICHAEL JONES (SBN 312831)
michael.jones@crosnerlegal.com
ZACHARY CROSNER (SBN 272295)
zach@crosnerlegal.com
CROSNER LEGAL, PC
9440 Santa Monica Blvd. Suite 301
Beverly Hills, CA 90210
Tel: (866) 276-7637
Fax: (310) 510-6429

Attorneys for Plaintiff
JULIO LOPEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

JULIO LOPEZ, on behalf of himself, the State
of California, and others similarly situated and
aggrieved,

Plaintiff,

v.

STEVEN LABEL, LLC, a Delaware Limited
Liability Company; STEVEN LABEL
CORPORATION, a California Corporation;
STEVEN LABEL, LLC, a California Limited
Liability Company; and DOES 1-100,
inclusive,

Defendants.

Case No. 22STCV21691

Assigned for All Purposes to:
Hon. Bruce Sotelo
Dept. 40

DECLARATION OF JULIO LOPEZ

Date: July 10, 2024
Time: 8:30 a.m.
Dept.: 40

Reservation ID: 222106000292

1 I, Julio Lopez, declare as follows:

2 1. I am an adult over the age of eighteen (18) years old. I am the Named Plaintiff
3 who filed the above-captioned lawsuit. I have personal knowledge of the facts set forth in this
4 declaration. I make this declaration in support of Plaintiff's Motion for Approval of PAGA
5 Settlement.

6 2. I began working for Steven Label around April 7, 2014, as a Printing Press
7 Operator, I operate printing presses at Defendants' Santa Fe Springs manufacturing plant, and I
8 also repairing broken or malfunctioning printing machinery as needed. In or around June 2021, I
9 suffered an on the job injury as a result of having to lift machine parts without the aid of a
10 hydraulic lift. Since that time I have been on disability leave. While I worked there I don't think I
11 was paid for all of my hours, as I would have to spend several minutes waiting in line to clock
12 in/out for shifts while off the clock, and during covid had to go through mandatory wellness
13 checks even though I wasn't clocked in. I also don't think I got all of my breaks like I was
14 supposed to, and frequently had breaks interrupted to go work a printing press or other machinery
15 that was down. I also used my own phone for company business, like communicating with
16 supervisors while on duty, without any reimbursement.

17 3. I decided to bring this lawsuit because I did not feel that I was treated fairly as an
18 employee of Defendants, especially with regard to not being paid properly for all the hours I
19 worked, as well missed meal and rest breaks and not getting any expense reimbursement. As a
20 result, I believe the other employees and myself are owed additional compensation for all of the
21 time we worked that was not paid for by Defendants, as compensation for not getting all our
22 breaks, and to pay for our expenses.

23 4. It is my understanding this lawsuit could not have been prosecuted or settled
24 unless I or some other employee decided to serve as a named plaintiff and pursue the case. In
25 deciding to serve as a named plaintiff, I understood that my name would be publicly attached to
26 this lawsuit and that my work experiences to some extent would be set forth in a public court file.
27 I recognized that I would need to devote a certain amount of time that I could have spent
28 otherwise. I also recognized that my bringing the lawsuit carried some degree of risk. Despite

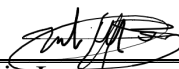
1 this, I decided to serve as the named plaintiff without any promise of recovery or compensation.

2 5. I am familiar with the work involved in prosecuting this case. I have participated
3 in numerous meetings and communications with my lawyers regarding this case. I am familiar
4 with the allegations and defenses of the claims in this case. I am familiar with the major events in
5 this case, including the investigation performed by my lawyers, the mediation with Defendant that
6 resulted in this settlement, and the preparation of settlement papers and the need to obtain court
7 approval of the proposed settlement. I participated in all stages of the litigation and provided my
8 lawyers with information and documents regarding my employment with Defendant.

9 6. I believe that the proposed settlement obtained on behalf of the other employees is
10 excellent in view of the issues and risks involved with the case.

11 7. I am not requesting any kind of service award for acting as the lead plaintiff in this
12 case since I am settling my personal claims with Defendants, including claims arising out of my
13 injury and disability, in a separate settlement.

14 I declare under penalty of perjury under the laws of California that the foregoing is true
15 and correct. Executed on 05 / 31 / 2024, at San Gabriel, California.

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19 _____
20 Julio Lopez
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