

Arby Aiwazian (SBN 269827)
Yasmin Hosseini (SBN 326399)
Ryan Slinger (SBN 351297)
LAWYERSfor JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff Margarita Rodriguez-Lopez

Additional Parties & Attorneys on the following page:

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

MARGARITA RODRIGUEZ-LOPEZ,
individually, and on behalf other members of
the general public similarly situated,

Plaintiff,

vs.

TORAY ADVANCED COMPOSITES, INC.,
an unknown business entity, and DOES 1
through 100, inclusive,

Defendants.

MARGARITA RODRIGUEZ-LOPEZ,
individually, and on behalf of aggrieved
employees pursuant to the California Private
Attorneys General Act,

Plaintiff,

vs.

TORAY ADVANCED COMPOSITES, INC.,
an unknown business entity, and DOES 1
through 100, inclusive,

Defendants.

Case No. 21CV376477

*Consolidated with Case No.'s ZICV386834
& 25CV464J81*

Honorable Charles F. Adams
Department 7

CLASS ACTION

**DECLARATION OF MARGARITA
RODRIGUEZ-LOPEZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: September 11, 2021
Time: 1:30 p.m.
Department: 7

*Rodriguez-Lopez
Class Complaint*

Filed: February 25, 2021

Armstrong

Complaint Filed: March 8, 2021

*Rodriguez-Lopez
PAGA Complaint*

Filed: September 20, 2021

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SADIE ARMSTRONG, individually, and on
behalf of aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

vs.

TORAY ADVANCED COMPOSITES ADS,
LLC, an unknown business entity, and DOES 1
through 100, inclusive,

Defendants.

Joshua David Boxer (SBN 226712)
Hayley Michelle Davis (SBN 358829)
MATERN LAW GROUP, PC
2101 E. El Segundo Blvd., Suite 403
El Segundo, California 90245
Tel: (310) 531-1900 / Fax (310) 531-1901

Attorneys for Plaintiff Sadie Armstrong

1 4. Throughout this matter, I was available to answer any questions my attorneys had,
2 and available to speak and meet with my attorneys whenever they needed me. I responded to them
3 as quickly as possible and gave them as much information and identified as many documents as I
4 could. I spent time speaking with my attorneys about the case, identifying potential witnesses,
5 providing my attorneys with documents and information concerning the case, and also describing
6 policies, practices, and procedures of Defendants.

7 5. As far as the settlement is concerned, I was available to review documents and
8 answer any questions my attorneys had. I reviewed the Settlement Agreement and discussed the
9 questions I had regarding the potential settlement with my attorneys before signing the settlement
10 papers.

11 6. I understand that a settlement has been reached in my case and what my duties and
12 responsibilities are as a class and PAGA representative. For example, I *am aware* that if the
13 settlement is granted preliminary approval, the Court will certify a class for settlement purposes,
14 and likely appoint me as the representative of the class and my attorneys as counsel for the class.
15 I also understand that my duties will include checking in on, monitoring, and conferring with my
16 attorneys to facilitate the notice and settlement administration process, and to provide information
17 that the Court needs in order to assess whether the settlement is fair, reasonable, and adequate.
18 Further, if any individuals who are potential class members contact me, I will take steps to have
19 them referred to the Court-appointed settlement administrator so that these individuals may receive
20 the necessary information and notice they may be eligible to receive in connection with the
21 settlement and contemplated final approval hearing.

22 7. I believe that I have done everything that my attorneys have asked of me and have
23 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class
24 members and the State of California with respect to aggrieved employees. I have volunteered to
25 represent and champion the interests of many other people with similar claims and injuries because
26 of the importance of the case and the necessity that all class members and aggrieved employees
27 benefit from the lawsuit equally. I understand that as a proposed class representative, and if
28 formally appointed as a class representative, I have and continue to represent the interests of all

members of the class in litigation to recover relief for the class. As an hourly-paid employee of Defendants who was subject to the same policies, practices, and procedures as the other members of the class, I have claims that are typical of those of the class. I consider the interests of the class just as I would consider my own interests. I understand that I may need to put the interests of the class before my own interests, although I have no reason to believe that my interests are in conflict with the interests of the class. I understand that any resolution of the lawsuit is subject to court approval and must be in the best interest of the class as a whole. I have participated, and continue to participate, in the lawsuit as necessary. I have actively followed and monitored the progress of the lawsuit, and have taken steps to make sure that the litigation is prosecuted by the skilled and effective attorneys that I have retained.

8. I think my efforts helped to get the result obtained in this matter, and as a potential class and PAGA representative, I respectfully request that the Court award me an enhancement award for my efforts in pursuing and participating in this matter, as well as my broader release of claims. Taking into consideration the time that I have dedicated to this matter, I believe that this amount is reasonable.

9. I am not related to anyone associated with Lawyersfor Justice, PC.

10. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as an enhancement award, my share of the settlement as a class member and as an aggrieved employee, and payment from Defendants in connection with a contemplated separate confidential individual settlement and general release agreement.

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

Executed on 08/11/2025, at Gilroy, California

Electronically Signed 202508-11 17:20:25 UTC. 47.35.4.134
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Margarita Rodriguez-Lopez