

Nicol E. Hajjar, Esq. (SBN 303102)  
[Nicol.Hajjar@wilshirelawfirm.com](mailto:Nicol.Hajjar@wilshirelawfirm.com)  
Tina Petrosian, Esq. (SBN 352752)  
[Tina.Petrosian@wilshirelawfirm.com](mailto:Tina.Petrosian@wilshirelawfirm.com)

**WILSHIRE LAW FIRM**

3055 Wilshire Blvd., 12th Floor  
Los Angeles, California 90010  
Telephone (213) 381-9988  
Facsimile: (213) 381-9989

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

JOHN ARIAS, individually, and on behalf of all  
others similarly situated; and JEFFREY  
HENSLEY, individually, and on behalf of all  
others similarly situated,

*Plaintiffs,*

v.

FLOWSERVE US, INC.; and DOES 1 through  
10, inclusive,

*Defendants.*

Case No.: 22STCV27829

**CLASS AND REPRESENTATIVE  
ACTION**

[Assigned for all purposes to: Hon. Laura  
Seigle, Dept. 17]

**PLAINTIFFS' NOTICE OF ERRATA RE:  
DECLARATION OF ESTABAN ROMO  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR PRELIMINARY  
APPROVAL FOR CLASS ACTION  
SETTLEMENT**

**FINAL APPROVAL HEARING**

Date: October 17, 2024

Time: 9:00 a.m.

Dept: 17

Complaint filed: August 25, 2022

Trial date: None set

1 **TO THE COURT AND TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 PLEASE TAKE NOTICE that on September 20, 2024, Plaintiffs' Motion for Preliminary  
3 Approval of Class Action Settlement was filed with the court, which included Declarations for  
4 class representatives. The fully executed copy of Plaintiff, Esteban Romo's Declaration in Support  
5 of Plaintiffs' Motion for Final Approval of Class and Representative Action Settlement and Class  
6 Representative Service Payment received today is being filed and attached hereto as **Exhibit 1**.

7  
8  
9 Dated: September 23, 2024

WILSHIRE LAW FIRM

10  
11 By:  \_\_\_\_\_

Nicol E. Hajjar, Esq.  
Tina Petrosian, Esq.

*Attorneys for Plaintiffs*

# EXHIBIT 1

Justin Lo, Esq. (SBN: 280102)

[Justin@caworklawyer.com](mailto:Justin@caworklawyer.com)

**WORK LAWYERS PC**

22939 Hawthorne Blvd., Suite 300

Torrance, CA 90505

Telephone: (310) 248-2944

Facsimile: (424) 355-8335

Attorneys for Plaintiff ESTEBAN ROMO, as representative of the State of California and the Labor and Workforce Development Agency, and on behalf of himself and other current and former employees.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**THE COUNTY OF LOS ANGELES**

ESTEBAN ROMO, on behalf of himself and  
all other aggrieved employees,  
Plaintiff,

v.

FLOWSERVE US INC., a Delaware  
Corporation doing business in California; and  
DOES 1-50, Inclusive,

Defendants.

Case No.: 22STCV27829

**DECLARATION OF ESTEBAN ROMO IN  
SUPPORT OF PLAINTIFF'S MOTION  
FOR FINAL APPROVAL OF CLASS AND  
REPRESENTATIVE ACTION  
SETTLEMENT AND CLASS  
REPRESENTATIVE SERVICE PAYMENT**

**Date: October 17, 2024**

**Time: 9:00 A.M.**

**Dept.: 17**

*Complaint Filed: August 24, 2022*

**DECLARATION OF ESTEBAN ROMO**

I, Esteban Romo declare:

1. I am an individual residing in the County of Los Angeles, State of California. I am over the age of eighteen (18) and am a Plaintiff in the action titled *ESTEBAN ROMO v. FLOWSERVE US INC.*, filed in the Superior Court of Los Angeles, Case No. 22STCV27829. I hereby submit this declaration in support of my adequacy as a Class Representative.

2. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto.
3. I was employed by Defendant from approximately September 2018 through April 2022.
4. I believe that certain employment practices of Defendants were unlawful, including Defendants' practice and policy of not failed to compensate Plaintiff and Plaintiff Class for overtime premium hours worked in excess of eight (8) hours per day as well as forty (40) hours per week. Defendants had a practice of requiring myself and my co-workers to work over eight (8) hours in a day and forty (40) hours on various legal tasks.
5. While I was employed, I was also forced to forego my rest and meal breaks due to Defendants' inadequate staffing and strict performance schedules. Furthermore, I was not compensated for missing my rest and meal breaks.
6. Despite the risks associated with filing a class action lawsuit, I believed that I could adequately represent the proposed class of employees and would prevail on my claims. At the time I agreed to become a class representative, I understood that Defendants directly opposed the merits of the lawsuit and the likelihood that the class would be certified.
7. I believe that I am an adequate class representative because my interests in this action are the same as other employees who worked for Defendants and were not paid for all overtime worked. I also believe that I have suffered the same and/or similar violations as many other class members.
8. Throughout this litigation, I have diligently served as a representative of aggrieved employees and class members. I made myself available to my attorneys at their request and conducted several telephone conferences with my attorneys and provided them a wealth of information about my employment with Defendant. I assisted my attorneys with the investigation process by providing documents and gathering information. I also helped review documents that Defendant produced

in this litigation, assisting my attorneys in understanding various time records and payroll records.

9. I also spoke with my attorneys extensively prior to mediation to help them understand the specific practices Defendant permitted that led me to believe legal violations had occurred.

10. Additionally, on May 26, 2023, I made myself available throughout the entire day to my attorneys during the private mediation session with Mr. Knight. In this mediation session where I answered any questions from my attorney.

11. During the settlement negotiations my attorneys had with Defendant, I understood the risk of moving forward with further litigation as well as a potential trial. Based on the substantial information provided, I believe the pending settlement terms are fair, reasonable and adequate, and the consideration to the proposed class in exchange for a release of claims asserted in the lawsuit is merited.

12. I estimate that I have spent no less than 26 hours total throughout this litigation, including my initial consultations, the numerous meetings with my attorney and or his co-workers, telephonically, gathering documents, reviewing documents, and attending the mediation session.

13. I spent significant time discussing with my attorneys various procedures and practices of Defendants operations.

14. I believe the settlement is fair on behalf of class members. I have been informed that there are no objections to the settlement and only two opt outs for the case. I believe this shows the class members are in agreement with the settlement and believe it is fair.

15. I understand that I may be entitled to additional payment for my role as a class representative and the time I spent working on this case. I believe my service payment is warranted as I have had to be patient and diligent during the course of litigation to both pursue and resolve this matter. I also understand that this amount is not guaranteed and is subject to court approval.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Dated 9/23/2024, at Los Angeles, California.

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*John Arias, et al. v. FLOWSERVE US, INC.*  
Case No.: 22STCV27829

I, Chris Silmon, state that I am employed in the aforesaid County, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 3055 Wilshire Blvd., 12<sup>th</sup> Floor, Los Angeles, California 90010.

On September 23, 2024, I served the foregoing **PLAINTIFFS' NOTICE OF ERRATA RE: DECLARATION OF ESTABAN ROMO IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL FOR CLASS ACTION SETTLEMENT**, on the interested parties by placing a true copy thereof, enclosed in a sealed envelope by following one of the methods of service as follows:

*Attorneys for Defendant,*  
**FLOWERVE US, INC.**

*Attorneys for Plaintiff,*  
Esteban Romo

- (X) **BY UPLOAD:** I hereby certify that the documents were uploaded by my office to the State of California Labor and Workforce Development Agency Online Filing Site
- (X) **BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known email address or e-mail of record in this action.

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

Executed on **September 23, 2024**, at Los Angeles, California.

/s/ Chris Silmon  
Chris Silmon