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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

JOEL FARIAS, on behalf of the State of
California and other aggrieved persons,

Plaintiff,

v.

HHS CONSTRUCTION, LLC, a California
limited liability company; and DOES 1 to 10,
inclusive,

Defendants.

Case No.: CIVSB2213104

*[Assigned for All Purposes to the Hon. Joseph
B. Widman, Dept. S36]*

**DECLARATION OF JOEL FARIAS IN
SUPPORT OF PLAINTIFFS' MOTION
FOR APPROVAL OF PAGA
SETTLEMENT**

Action Filed: June 23, 2022

DECLARATION OF JOEL FARIAS

I, Joel Farias, declare as follows:

1. I am an adult resident of the State of California, and if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am a former employee of HHS Construction, LLC (“HHS Construction”). I worked for HHS Construction from approximately March 2021 to approximately October 2021 as an hourly-paid non-exempt employee. Throughout the entirety of my employment, I was subject to all of HHS Construction’s policies and practices that have been alleged as unlawful in the Private Attorneys General Act (“PAGA”) Notice sent to HHS Construction and the Labor & Workforce Development Agency and in the PAGA Complaint.

4. I initiated this lawsuit because I was concerned that I was not paid properly for all the hours that I worked, and I was not provided all my meal and rest periods.

5. By filing this lawsuit, I hoped that I might be able to change HHS Construction’s policies to better protect the working conditions of my co-workers. I also understand that it was my duty to represent the best interests of the aggrieved employees, to know about the lawsuit, to assist my attorneys, and to keep updated on the case.

6. I have invested a lot of personal time and energy into this lawsuit. As detailed more fully below, I have spent approximately 30 hours on this case. I made it a priority to be actively involved because I wanted to do everything I could to assist my attorneys in prosecuting this case.

7. Throughout this case, I spent a lot of time on the phone with my attorneys to get updates about the case and provide them with information. For example, during some of the phone calls, my attorneys and I were able to identify instances when I was not paid correctly.

1 Additionally, leading up to the mediation, I had multiple lengthy phone calls with Wilshire Law
2 Firm, PLC regarding the claims at issue and what was to transpire at the mediation.

3 8. Throughout the case, I also spent time looking for documents relevant to the case to
4 send to my attorneys. I spent considerable time looking for documents, including when I first
5 contact my attorneys, before the lawsuit was filed, and before my case was mediated. I also spent
6 time reviewing legal documents in this case, including the retainer and settlement agreement and
7 discussed the terms with my attorneys.

8 9. Additionally, I made myself fully available on the day of mediation and was in
9 continuous contact with my attorneys to assist with any questions or issues that may have arisen.

10 10. I believe the settlement is a good settlement and I would recommend that the Court
11 approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad that I
12 had the opportunity to represent the aggrieved employees in this lawsuit and that I was able to
13 recover money through a settlement for the aggrieved employees.

14 11. I did not make the decision to file this action lightly. I was concerned by the attention
15 a publicly filed lawsuit, and especially a representative action, would attract. My name would be
16 associated with a lawsuit that I filed against my former employer. I am mindful that prospective
17 employers might find out that I sued HHS Construction. Nevertheless, I felt that important rights
18 were at stake, that others were being harmed, and that something ought to be done about it.

19 12. I also understand that there was financial risk in bringing this lawsuit. For example,
20 I knew that if I did not prevail in this lawsuit that I could potentially be responsible for HHS
21 Construction's attorneys' fees and costs.

22 13. I understand that the settlement agreement provides a service payment to me in the
23 amount of \$10,000.00. I believe this amount is fair compensation for my time and effort on this
24 case, my help in prosecuting this case, and the risks with respect to my future employment.

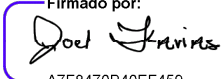
25 14. Based on my involvement in this case and the benefits provided to my former co-
26 workers, I can say I helped stand up for the other workers who might have been too afraid to say
27 anything to management because they did not want to risk losing their jobs or risk the stigma of
28 suing an employer. I was not afraid to take that risk because I strongly care about helping out my

former co-workers.

15. I carefully reviewed and ultimately signed the PAGA Settlement Agreement and my attorneys answered all the questions I had. I believe the settlement terms and allocations are fair, adequate, and reasonable given the strength of the PAGA claims and HHS Construction's defenses.

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

Executed on 2/9/2026, at San Diego, California.

Firmado por:

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Joel Farias