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8 Attorneys for Defendant HALE CONSTRUCTION, INC.

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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF SAN JOAQUIN**
13

14 Rodrigo Lopez Rojas and Enrique Guzman Orozco,
15 individually, and on behalf of other members of the
16 general public similarly situated, and on behalf of
17 other aggrieved employees pursuant to the
18 California Private Attorneys General Act;

19 Plaintiff,

20 vs.

21 Hale Construction, Inc. a California corporation;
22 and DOES 1-10, inclusive;

23 Defendants.
24

CASE NO. STK-CV-UOE-2022-0003667
Assigned to Honorable Robert T. Waters
Department: 11B

DECLARATION OF KALLEY R. AMAN
RE: CLASS ACTION SETTLEMENT

25 I, Kalley R. Aman, hereby declare as follows:

26 1. I am a Partner at the law firm Buchalter LLP, counsel of record for Defendant Hale
27 Construction, Inc. ("Defendant"). The following facts are true of my own personal knowledge and,
28 if called upon to testify to the truth of these statements, I could and would competently do so under
oath.

2. On May 11, 2022, plaintiff Rodrigo Lopez Rogas ("Rojas") filed a putative class
action against Defendant, Case No. STK-CV-UOE-2022-0003667. On June 28, 2023, plaintiff
Enrique Guzman Orozco ("Orozco") filed a putative class action against Defendant, Case No. STK-
CV-UOE-2023-8042.

1 3. On or about June 22, 2026, the parties filed a Stipulation to Consolidate the Rojas
2 and Orozco actions, with the Rojas action designated as the Lead Action (“Consolidated Action”).

3 4. On June 22, 2026, Plaintiffs filed a Second Amended Class Action Complaint for
4 Damages and Enforcement Under the Private Attorneys General Act in the Consolidated Action
5 (“SAC”). In the SAC, Rojas and Orozco assert claims for: (1) failure to pay properly overtime
6 wages, (2) failure to pay minimum wages, (3) failure to provide compliant meal periods and
7 premiums in lieu thereof, (4) failure to provide compliant rest periods and premiums in lieu thereof,
8 (5) failure to timely pay wages during employment, (6) failure to timely pay wages upon
9 termination, (7) failure to provide compliant wage statements, (8) failure to maintain requisite
10 payroll records, (9) failure to reimburse necessary business expenses, (10) violation of California
11 Business & Professions Code Section 17200 *et seq.*, and (11) violation of California Labor Code
12 Section 2698 *et seq.* (California Private Attorney General Act of 2004).

13 5. I am not aware of any other overlapping class action, collective action, or PAGA
14 representative action against Defendant.

15 6. Buchalter LLP has no conflicts of interest with the class administration, Phoenix
16 Settlement Administrators.

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

19 Executed on this 20th day of July, 2026 in Los Angeles, California.

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KALLEY R. AMAN
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