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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES**
11

12 JESUS GUADARRAMA ESTRADA, an
individual and on behalf of all others similarly
13 situated;

14 Plaintiff,

15 vs.

16 TN TRUSS COMPONENTS, INC., a
California corporation; and DOES 1 through
17 50,

18 Defendants.

Case No.: 25STCV02752

[Assigned for All Purposes to:
Hon. Theresa M. Traber, Dept. 1]

**DECLARATION OF JESUS
GUADARRAMA ESTRADA IN
SUPPORT OF MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

(Filed concurrently with Motion for Approval
of PAGA Settlement; Supporting
Declarations; and [Proposed] Order)

DATE: September 3, 2026

TIME: 10:30 a.m.

DEPT: 1

Action Filed: January 31, 2025

Trial Date: Not Set

1 I, JESUS GUADARRAMA ESTRADA, hereby declare as follows:

2 1. I am an individual over the age of 18 year and the named Plaintiff in the above-
3 captioned matter. This declaration is submitted in support of approval of the proposed class action
4 settlement ("Settlement") reached in this case. I have personal knowledge of the facts contained in
5 this declaration, and if called as a witness, could and would testify as to their accuracy.

6 2. I was employed by Defendant TN Truss Components, Inc. ("Defendant") as a non-
7 exempt employee for more than 10 years until approximately January 27, 2025 as a piece-rate
8 laborer. During my employment with Defendant, I was subject to Defendant's wage and hour
9 policies and practices that are at issue in this case.

10 3. Specifically, I was paid on a piece rate basis but Defendant failed to state the number
11 of piece rate units and rates in my paystubs, so I did not know if I was paid correctly, I sometimes
12 did not receive full 30 minute meal periods before the end of the fifth hour of work and did not
13 receive 10 minute rest breaks, and I sometimes worked off the clock. As a result of the foregoing
14 issues, I believe I received inaccurate wage statements and was not paid all wages when my
15 employment with Defendant ended. I believe other non-exempt employees of Defendant were
16 subject to the same policies and procedures discussed above and that my claims against Defendant
17 for unpaid wages and statutory and civil penalties are typical of other employees' claims.

18 4. I have been actively involved in this case since I first retained Justice for Workers,
19 P.C. ("JFW") in January 2025. Without waiving the attorney-client privilege, prior to filing this
20 lawsuit, my attorneys explained my role and responsibilities as a PAGA representative, and I
21 understand my responsibilities as a PAGA representative. Since retaining my attorneys, I have had
22 many discussions and meetings with the attorneys and staff at JFW, discussions regarding
23 Defendant's wage and hour practices and my claims in this case, litigation strategy, updates on how
24 the case was proceeding, the Settlement, and how I could help the case and potential Aggrieved
25 Employees. I also gathered and reviewed documents for use in the lawsuit and reviewed relevant
26 documents with my attorneys. I estimate that I have spent at least 20 hours on this case from the
27 time I first spoke with my attorneys regarding this case until the present.

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5. Furthermore, there is no conflict between my interests and the interests of the Aggrieved Employees that I am seeking to represent. My interests are entirely coextensive with the interests of Aggrieved Employees. I allege that I was injured by the same company-wide policies and practices to which Aggrieved Employees were subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests of Aggrieved Employees by initiating this litigation, undertaking extensive class discovery, and evaluating the proposed settlement to assure that it is fair.

6. I understood that at the time I filed this action, as a PAGA Representative, I owed a duty to Aggrieved Employees to faithfully prosecute this action with their best interests at the forefront of every decision. I understood that I could not make any decision in this action for the sole benefit of my personal interest. I understood that in executing this duty, I might have been asked to sacrifice my personal best interests for the benefit of the interests of the putative class members. Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible relief for my former co-workers for what I perceived to be Defendant's unlawful wage and hour practices. I believe that I faithfully executed the duties of a PAGA Representative throughout this litigation and will continue to do until this litigation is fully and finally resolved.

7. I understand that my attorneys will request that the Court approve a service award of \$10,000.00 for my efforts on behalf of Aggrieved Employees. I believe this amount is reasonable based on the amount of time and effort I have devoted to this case, the risks I have undertaken as a PAGA representative. My support for the Settlement is not contingent on my receiving this service award.

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

Executed on July 2, 2026 at Rosamond, California.

Jesus Guadalupe

JESUS GUADARRAMA ESTRADA