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

JUAN DAVID ARREOLA CARRILLO, as an
individual and on behalf of all others similarly
situated,

Plaintiff,

vs.

KPS GLOBAL, LLC, a Delaware corporation;
and DOES 1 through 100,

Defendants.

Case No. 22STCV19527

*[Assigned for all purposes to the Hon.
Kenneth R. Freeman, Dept. 14]*

**DECLARATION OF JUAN DAVID
ARREOLA CARRILLO IN SUPPORT
OF APPROVAL OF CLASS ACTION
SETTLEMENT**

Action Filed: June 15, 2022
Trial Date: None Set

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I, Juan David Arreola Carrillo, declare as follows:

1. I am an individual over the age of 18 and am the named Plaintiff in this matter.

This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Defendant KPS Global, LLC (“KPS”) in California from approximately May 2017 until approximately December 2021. Some of the job titles I had during that time were “Assembler” and “Machine Operator.” During my employment, I received bonuses for safety and attendance. Because I worked with glues and other adhesives, I was expected to delay, shorten, or even skip my meal period on many occasions. When I worked long shifts over 10 hours I did not get to take a second meal period. This issue extended to my 10-minute rest periods as well because I was regularly not able to step away from the machines for those breaks. I do not believe I received any extra pay for not receiving all of my meal or rest periods during my employment. Because of these issues, I believe KPS did not issue me accurate wage statements or pay me all wages I was owed when I left.

3. I started this lawsuit against KPS because I wanted KPS to comply with the law and treat its employees fairly. I feel that I have taken on a greater burden than any of the other KPS employees because I have been actively involved in the litigation, and because it is my name that is attached to the lawsuit. Even though I understood that this lawsuit would be a public record, I accepted that burden for the benefit of KPS' other workers.

4. I have been actively involved in this case since before it was filed. Some of the tasks I have performed include, gathering and reviewing relevant policy documents and pay statements for use in the lawsuit, providing factual information about KPS' policies and practices at the facilities, including the bonus programs, and helping identify other employees who also experienced the same issues that I did. I also made myself available the entire day of mediation to answer my attorneys' questions. I estimate that I have spent at least 15 total hours on these activities.

1 I declare under penalty of perjury under the laws of the state of California and the United
2 States that the foregoing is true and correct. Executed on May 8, 2023, in Hesperia,
3 California.

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Juan David Arreola Carrillo (May 8, 2023 17:08 PDT)
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