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8 Attorneys for Plaintiff Vincent Urrea,
9 on behalf of himself all others similarly situated,
10 the general public, and all “aggrieved employees”
11 pursuant to Labor Code § 2698 *et seq.*,
12

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF MADERA**

15 VINCENT URREA, on behalf of himself
16 all others similarly situated, the general
17 public, and all “aggrieved employees”
18 pursuant to Labor Code § 2698 *et seq.*,

19 Plaintiff,

20 v.

21 EVAPCO, INC., a California corporation,
22 and DOES 1 through 10, inclusive,

23 Defendants.

CASE NO: MCV094877

Assigned to the Honorable Eric J. LiCalsi, Dept. 44

**DECLARATION OF VINCENT URREA IN
SUPPORT OF UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS AND
REPRESENTATIVE ACTION SETTLEMENT**

Date: August 4, 2026

Time: 8:30 a.m.

Dept.: 44

Complaint Filed: April 21, 2025

1 I, VINCENT URREA, hereby declare and state as follows:

2 1. I am the named Plaintiff in this lawsuit against Defendant Evapco, Inc.
3 (“Defendant”) and I submit this declaration in support of Plaintiff’s Unopposed Motion for
4 Preliminary Approval of Class and Representative Action Settlement. I am a competent adult and
5 worked for Defendant as a non-exempt employee during the relevant time period. I have personal
6 knowledge of the facts set forth herein, and if called as a witness to testify to them, I could and
7 would do so competently.

8 2. I contacted my current attorney when I questioned the employment practices of
9 Defendant prior to commencing this lawsuit. I accepted the opportunity to act as a Class
10 Representative in a class action on behalf of other employees of Defendant whom I believed were
11 being subjected to labor law violations in addition to asserting individual wage, hour, and
12 termination-related claims.

13 3. Specifically, I questioned Defendant’s policies of failing to provide meal and rest
14 periods, pay all minimum and overtime wages, timely compensate employees upon separation of
15 employment, and issue its employees accurate and complete wage statements. Through many
16 discussions with my lawyer, I learned these may be illegal practices and Defendant’s employees
17 might have recourse for them.

18 4. By bringing this lawsuit, and throughout its course, I have put the interests of the
19 class ahead of my own. I understood that I could possibly earn a small enhancement payment if
20 this case resolved itself favorably, but always knew that I could also be responsible for paying
21 Defendant’s attorneys’ fees and costs if it did not. My goal in bringing this lawsuit was to obtain
22 a recovery on behalf of myself and the class, and even more importantly, to put an end to what I
23 believed were illegal practices on the part of Defendant. I believe I have achieved both through
24 this lawsuit and settlement.

25 5. I am very happy about the results of this litigation. I am satisfied that Defendant is
26 compensating class members for penalties and interest that I believe we are due.
27
28

6. At the onset of this case, I spent time through numerous phone calls with my attorney explaining what I understood to be the policies and procedures of Defendant and how they were applied to me and others I worked with. During the course of this litigation, up through and following the settlement process, I kept actively involved with its status, tracking the status of the case and participating as much as possible.

7. While I have not maintained detailed time records of my activities in connection with this litigation, I believe that I have spent and will spend a total of approximately 20 hours assisting my attorney with the preparation of this case, and doing work and analysis independent from my attorney both before and during this case, including conducting an independent investigation of the facts.

8. Before this litigation commenced, and throughout its course, I have spent approximately 10 or more hours gathering, organizing, and reviewing documents and information for this lawsuit. I sifted through many of my own documents and reviewed information produced by Defendant as part of this case.

9. I have communicated with my attorney each month to track my case's status. I have taken an active involvement in this matter throughout its course.

10. This lawsuit will almost certainly result in reputational harm to me. There is a stigma associated with suing anyone, let alone your former employer. I will probably be adversely affected when it comes to obtaining future employment—employers who learn that I sued Defendant in a class action will likely avoid hiring me.

11. I do not believe that I have any conflicts with other members of the class. My interests in bringing this lawsuit—for Defendant to change its labor practices going forward and to compensate current and former employees—are the same as those of all other class members.

12. I also have a separate individual settlement with Defendant to settle claims related to wrongful termination and in exchange for a general release of all claims.

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

3 Executed on 07 / 10 / 2026 at Fresno, California.

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5
6 VINCENT URREA