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Attorneys for Plaintiff TED T. PHILLIPS,
individually, and on behalf of other similarly situated
employees and aggrieved employees pursuant to the
California Private Attorneys General Act

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

TED T. PHILLIPS, individually and on behalf
of other similarly situated employees and
aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

vs.

PROFESSIONAL PLASTICS, INC;
SPECTRA360, INC.; and DOES 1 through
25, inclusive,

Defendants.

Case No.: 25CV116316

Assigned for All Purposes to the Honorable
S. Raj Chatterjee, Dept. 21

**DECLARATION OF PLAINTIFF
TED T. PHILLIPS IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Reservation No.: 807752875747

Date: October 20, 2026
Time: 2:30 p.m.
Dept: 21

Complaint Filed: March 21, 2024
FAC Filed: May 27, 2025
Trial Date: Not Set

DECLARATION OF TED T. PHILLIPS

I, Ted T. Phillips, declare and state as follows:

1. I am over the age of eighteen (18) and reside in the State of California. I am the named Plaintiff in this action. I make this declaration based on my own personal knowledge, and if called as a witness, I could and would competently testify to the matters stated herein.

2. I was employed by Defendant Professional Plastics, Inc. ("Defendant") as an hourly-paid, non-exempt Warehouse Associate from approximately September 2020 through February 2025. During my employment, I performed various duties for Defendant, including shipping and receiving duties.

3. I believed Defendant's pay and break practices may have violated California law, so I sought legal advice regarding my work experiences and the possibility of pursuing legal action. I contacted Blackstone Law, APC and spoke with its attorneys. My goal was to help ensure Defendant was held accountable for failing to properly compensate employees for all hours worked and for failing to provide compliant meal and rest breaks. After speaking with counsel, I also conducted my own research regarding class actions and representative actions under the Private Attorneys General Act ("PAGA"). I then continued consulting with Blackstone Law, APC regarding my experiences, potential class claims, PAGA claims, and what it would mean to serve as a plaintiff in a class and representative action.

4. As part of my responsibilities as a class and PAGA representative, I regularly conferred with my attorneys about this case. This included searching for and providing documents related to my employment with Defendant, answering my attorneys' questions about those documents, providing information about Defendant's workplace practices and the duties performed by other hourly-paid and/or non-exempt employees, and assisting my attorneys in identifying additional documents and information to seek from Defendant.

5. I also routinely communicated with my attorneys and their staff to ensure they had my current contact information and any additional information I obtained. I made myself available to answer questions regarding Defendant's practices and treatment of employees, responded as promptly as I could, and provided as much relevant information as possible. In addition, I assisted my attorneys

1 with responding to written discovery.

2 6. I understood that in the event this matter did not settle and proceeded with trial, I would
3 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
4 responsibilities that are necessary for this lawsuit.

5 7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
6 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
7 also understood there was a risk of losing any job and/or income due to the time that I would have to
8 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. In
9 contrast, the other employees who will be receiving money from this lawsuit did not have to file a
10 claim or take the risk that I took in bringing this action.

11 8. I reviewed the settlement agreement, discussed the settlement agreement with my
12 attorneys, and asked them questions before signing it.

13 9. I believe I have fulfilled the responsibilities my attorneys asked of me and, to the best
14 of my ability, worked to seek relief for the Class, the PAGA Employees, and the State of California. I
15 have spent approximately 45 to 50 hours participating in this case, including the activities described
16 above. I believe my efforts contributed to the result obtained in this matter.

17 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
18 approval, and any settlement must be designed in the best interest of the Class as a whole. At all times
19 throughout the course of this litigation I have considered the interests of the Class and put them before
20 my own personal interests.

21 11. I understand that any incentive or enhancement award is discretionary and may
22 compensate a named plaintiff for the quality and quantity of work performed on behalf of the Class
23 and PAGA Employees, the financial and reputational risks undertaken in bringing a class and
24 representative action, and the benefits achieved through the representative's efforts. For the reasons
25 stated above, I believe my participation and efforts in this matter support the requested enhancement
26 award.

27 12. I respectfully request that the Court approve and award me an Enhancement Payment
28 in the amount of \$10,000 for my efforts and active participation in this case and for the broader general

1 release of claims that I have or may have against Defendant in connection with the settlement. Taking
2 into consideration the time I dedicated to this case, the work I performed on behalf of the Class and
3 PAGA Employees, and the release I am providing, I believe this amount is reasonable.

4 13. I am not related to anyone associated with Blackstone Law, APC.

5 I declare under penalty of perjury under the laws of the State of California that the foregoing
6 is true and correct. Executed on 09/16/2026, at Sacramento, California.

7 *Ted T Phillips*
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