Docusign Envelope ID: 610F6F12-CBF6-8334-814F-23A8B68ABF5B

BOKHOUR LAW GROUP, P.C.
Mehrdad Bokhour, Esq., CA Bar No. 285256
mehrdad@bokhourlaw.com
1901 Avenue of the Stars, Suite 520
Los Angeles, California 90067
Tel: (310) 975-1493; Fax: (310) 675-0861

FALAKASSA LAW, P.C.
Joshua S. Falakassa, CA Bar No. 295045
josh@falakassalaw.com
1901 Avenue of the Stars, Suite 520
Los Angeles, California 90067
Telephone: (818) 456-6168; Fax: (888) 505-0868

Attorneys for Plaintiff and the Putative Classes

[Additional counsel listed on next page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ROBERT MACIAS, on behalf of himself and all others similarly situated,

Plaintiff,

vs.

LEFIEL MANUFACTURING CO., a California corporation; and DOES 1-50, inclusive,

Defendants.

Case No.: 25STCV04710
(Related to Case Nos.: 25STCV06644 and 25STCV13876)

Honorable Theresa M. Traber
Department 1

DECLARATION OF ROBERT MACIAS IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Date:	October 28, 2026
Time:	10:30 a.m.
Dept.:	1
Complaint Filed:	February 20, 2025
Trial Date:	Not Set

Docusign Envelope ID: 610F6F12-CBF6-8334-814F-23A8B68ABF5B

Ryan A. Quadrel (State Bar No. 308311)
rquadrel@blackstonepc.com
Shelby L. Miner (State Bar No. 318338)
sminer@blackstonepc.com
Alexandra Rose (State Bar No. 329407)
arose@blackstonepc.com
Jasmine Y. Kianfard (State Bar No. 349975)
jkianfard@blackstonepc.com
BLACKSTONE LAW, APC
8383 Wilshire Boulevard, Suite 745
Beverly Hills, California 90211
Telephone: (310) 622-4278

Attorneys for Plaintiff WALTER REDD, individually, and on behalf of other similarly situated employees

Docusign Envelope ID: 610F6F12-CBF6-8334-814F-23A8B68ABF5B

DECLARATION OF ROBERT MACIAS

I, Robert Macias, state and declare:

1. I am the Plaintiff in the above-captioned action and have personal knowledge of all matters stated herein, and could competently testify thereto. I make this declaration in support of Plaintiffs' motion for preliminary approval of the class action and PAGA settlement.

2. I was employed by Defendant as an hourly-paid, non-exempt Production Control Planner. My job duties included releasing shop orders to the production floor and tracking jobs to help ensure on-time delivery. I was initially employed by Defendant from approximately 2007 through 2014, and I returned to work for Defendant in approximately May 2019. My employment with Defendant has since ended.

3. During my employment with Defendant, I became concerned about several of Defendant's wage-and-hour practices, including its payroll and break practices and other practices that I discussed with my attorneys. After consulting with counsel, I decided to pursue this action on behalf of myself and other employees whom I believed were affected by similar practices. Although I was concerned that suing my employer could affect future employment opportunities, I ultimately decided to pursue the action because I believed these practices should be challenged.

4. When I first retained my attorneys and chose to pursue this case on a class action basis, I understood that I had specific burdens as the "Class Representative," which included: (1) representing the interests of all Class Members; (2) placing the interests of the Class above my own; (3) actively participating in the litigation and keeping generally aware of the status and progress of the lawsuit. Moreover, I understood that any resolution of the lawsuit is subject to court approval and must be designed in the best interests of the class as a whole.

5. I respectfully request that the Court approve the requested Enhancement Payment for the following reasons.

6. First, I devoted a substantial amount of time to assisting Class Counsel and performed significant services on behalf of the Settlement Class, all of which contributed to achieving the proposed Settlement.

7. On February 20, 2025, I provided written notice to the California Labor and Workforce

Docusign Envelope ID: 610F6F12-CBF6-8334-814F-23A8B68ABF5B

Development Agency and Defendant regarding the alleged Labor Code violations at issue in this case. That same day, I filed my Class Action Complaint in the Superior Court of California, County of Los Angeles, on behalf of myself and other similarly situated employees.

8. On June 3, 2025, the Court ordered the Redd Class Action (Walter Redd v. LeFiell Manufacturing Co., Los Angeles County Superior Court Case No. 25STCV06644) and the Redd PAGA Action (Walter Redd v. LeFiell Manufacturing Co., Los Angeles County Superior Court Case No. 25STCV13876) and my action related.

9. I estimate that I devoted approximately 35 to 40 hours assisting Class Counsel in this litigation. My involvement included participating in telephone conferences and meetings with counsel, communicating by email and text message, reviewing documents and records, discussing Defendant's payroll and break practices, identifying relevant witnesses and information, assisting counsel in evaluating the claims, preparing for mediation, reviewing settlement proposals, and remaining available to answer questions and provide additional information throughout the litigation.

10. I also participated in evaluating the proposed Settlement. I discussed with Class Counsel the strengths and weaknesses of the claims and defenses, reviewed and discussed settlement proposals, and considered the terms of the proposed Settlement before authorizing its acceptance. Based on my involvement in the case and my discussions with Class Counsel, I believe the Settlement is fair, reasonable, and in the best interests of the Settlement Class.

11. My work also continued after the mediation, as I reviewed settlement agreements and other related documents and maintained communication with my attorneys throughout the settlement approval process. This litigation has remained pending for more than a year and a half, during which time I have remained actively involved and available to assist counsel whenever needed.

12. I respectfully request that the Court approve the proposed Enhancement Payment in recognition of the time, effort, and responsibilities I undertook on behalf of the Settlement Class. In serving as a Class Representative, I understood that I was responsible for considering the interests of the Class as a whole and not merely my own individual interests. Through my participation in this case, I assisted Class Counsel in obtaining a substantial, non-reversionary settlement that will provide monetary relief to Settlement Class Members.

Docusign Envelope ID: 610F6F12-CBF6-8334-814F-23A8B68ABF5B

13. By serving as a named Plaintiff and Class Representative, I also assumed responsibilities and burdens that absent class members did not. My name became publicly associated with this lawsuit, and I understood that my participation would become part of the public record. I undertook these responsibilities while continuing to work for Defendant and despite concerns that bringing and participating in a lawsuit against my current employer could negatively affect my employment or working relationships.

14. I understood that there was no guarantee that this litigation would result in a recovery for the Class or for me, and that I could receive nothing despite the time and effort I devoted to the case. I nevertheless continued to assist Class Counsel and fulfill my responsibilities as a Class Representative because I believed the claims were important and that the affected employees should have an opportunity to obtain relief.

15. Throughout the litigation, I remained informed regarding the status of the case, communicated with Class Counsel, provided information and assistance when requested, and participated in evaluating the proposed Settlement. I remained committed to fulfilling my responsibilities as a Class Representative and representing the interests of the Settlement Class.

16. For these reasons, I respectfully request that the Court approve the proposed Enhancement Payment.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 9/30/2026, at Corona, California.

Signed by:
Robert Macias
2C93958F9B98488...

Robert Macias