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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

JUAN DORANTES MIRANDA, as an
individual and on behalf of all others
similarly situated,

Plaintiff,

vs.

C M C STEEL FABRICATORS, INC., dba
CMC REBAR, a Texas corporation; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: CIVSB2511003

*[Assigned for all purposes to the Hon. Wilfred J.
Schneider, Jr., Dept. S32]*

**DECLARATION OF PLAINTIFF JUAN
DORANTES MIRANDA IN SUPPORT OF
MOTION FOR SETTLEMENT APPROVAL
OF CLAIMS BROUGHT UNDER THE
PRIVATE ATTORNEYS GENERAL ACT,
REASONABLE ATTORNEYS' FEES AND
COSTS, AND REPRESENTATIVE
ENHANCEMENT PAYMENT**

Date: August 27, 2026
Time: 8:30 a.m.
Dept.: S32

Action Filed: April 17, 2025
Trial Date: None Set

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I, JUAN DORANTES MIRANDA, declare as follows:

1. I am an individual over the age of 18 and the named plaintiff in this matter. This declaration is submitted in support of approval of the proposed PAGA 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. Because I do not speak or read English fluently, I was interviewed in Spanish for this declaration with the assistance of an interpreter, who reviewed it with me and translated its contents between English and Spanish.

2. I was employed by C M C Steel Fabricators, Inc., dba CMC Rebar (“Defendant”) as a non-exempt Machine Operator at its Fontana location from approximately October 2023 to approximately January 2025, first through a staffing agency before being hired as a direct-hire employee on March 11, 2024. My primary job duties for Defendant involved cutting cable.

3. During my employment, Defendant required me to arrive and clock in several minutes before the start of my scheduled shift, as well as to continue working for several minutes after the scheduled end of my shifts before clocking out. However, rather than paying me to the minute, Defendant's timekeeping system rounded my hours worked in quarter of an hour increments, and I was instead paid based upon this rounded time. Defendant also rounded my time entries when I clocked in and out for meal periods. Further, Defendant paid me bonuses based on company sales. However, whenever I earned these bonuses and also earned overtime wages or sick pay wages in the same time period, my overtime and sick pay wages were calculated using my base hourly rate of pay. Also, Defendant did not authorize and permit me to take a third 10-minute rest period until I worked more than 12 hours in a single workday. Finally, Defendant required me to use my personal cell phone to text and talk with my supervisors about my job duties, but did not reimburse me for any portion of my cellular phone bill.

4. When I first filed my lawsuit, I understood that it had the chance to benefit Defendant's other workers by helping them recover money they were owed. I felt that Defendant was not following the law, and I wanted Defendant to treat its employees fairly. I feel that I have taken on a greater burden than any of the other employees because I have been actively involved

1 in the litigation since it began, and because it is my name that is attached to the lawsuit. Although
2 I was aware that I would be filing a public lawsuit, I chose to move forward with the case anyway.
3 Through my efforts, Defendant has agreed to a settlement that will benefit hundreds of current
4 and former employees of Defendant, and I believe that I should be compensated for carrying the
5 burden of this litigation for the benefit of the other employees and the State of California.

6 5. I have been actively involved in this case since before it was even filed. Among
7 other things, I searched for relevant documents for use in the lawsuit, provided factual information
8 and relevant documents to my attorneys, had innumerable phone calls with my attorneys to
9 discuss the claims in the lawsuit and Defendant's practices, discussed the status of the case and
10 general case strategy with my attorneys on multiple occasions, provided valuable input and
11 documents to assist my attorneys in preparing for mediation, made myself available throughout
12 the mediation that lead to this settlement, answered questions posed by the mediator about my
13 time and experiences working for Defendant, reviewed and provided input regarding the
14 settlement in this case, and otherwise assisted my attorneys in moving this case towards
15 resolution. I estimate that I have spent approximately 25-30 hours in total on these activities.

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17 I declare under penalty of perjury under the laws of the state of California and the United
18 States that the foregoing is true and correct. Executed on May 26, 2021, at Riverside, California.

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21 Juan Dorantes (May 26, 2026 19:49:31 PDT)
22 Juan Dorantes Miranda
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