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

ERIK RODRIGUEZ HERNANDEZ,
individually and on behalf of other members
of the general public similarly situated and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act,

Plaintiff,

v.

TERRACON CONSULTANTS, INC., a
Delaware corporation; TSVC, INC., an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: STK-CV-UOE-2024-0008820

Honorable
Department 10D

CLASS ACTION

**DECLARATION OF ERIK RODRIGUEZ
HERNANDEZ IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date:
Time: 9:00 a.m.
Department: 10D

Complaint Filed: July 26, 2024
FAC Filed: July 14, 2025
Trial Date: None Set

DECLARATION OF ERIK RODRIGUEZ HERNANDEZ

I, Erik Rodriguez Hernandez, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Terracon Consultants, Inc. and TVSC, Inc. (“Defendants”) from approximately November 2020 to approximately February 2022 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences with Defendants and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. Throughout this matter, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I

1 could. I spent time speaking with my attorneys about the case, identifying potential witnesses,
2 providing my attorneys with documents and information concerning the case, and also describing
3 policies, practices, and procedures of Defendants.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the
6 Settlement Agreement and discussed the questions I had regarding the potential settlement with my
7 attorneys before signing the settlement papers.

8 6. I think my efforts helped to get the result obtained in this matter, and as a potential
9 class and PAGA representative, I respectfully request that the Court award me a class
10 representative enhancement award for my efforts in pursuing and participating in this matter, as
11 well as my broader release of claims. Taking into consideration the time that I have dedicated to
12 this matter, I believe that this amount is reasonable.

13 7. I am not related to anyone associated with Lawyers for Justice, PC.

14 8. I have not entered into any undisclosed agreements, nor have I received any
15 undisclosed compensation in this matter. The only compensation I will receive is whatever amount
16 the Court awards as an enhancement award, as well as my share of the settlement as a class
17 member and aggrieved employee.

18 I declare under penalty of perjury under the laws of the State of California that the
19 foregoing is true and correct.

03/31/2026

20 Executed on this ____ day of March 2026, at Yuba City, California.

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22 Electronically Signed 2026-03-31 21:50:19 UTC - 209.184.130.4
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