

Ryan A. Quadrel (State Bar No. 308311)
rquadrel@blackstonepc.com
Joseph O. Marshall (State Bar No. 354066)
jmarshall@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
Tel: (310) 622-4278 / Fax: (855) 786-6356

Attorneys for Plaintiffs OSCAR BENITEZ,
individually, and on behalf of other similarly
situated employees, and MEGAN ELLIS,
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 ORANGE**

OSCAR BENITEZ, individually, and on
behalf of other similarly situated employees;
MEGAN ELLIS, individually, and on behalf
of other similarly situated employees and
aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiffs,

vs.

RAPID MANUFACTURING, LCR; and
DOES 1 through 25, inclusive,

Defendants.

Case No.: 30-2025-01462691-CU-OE-CXC

Honorable Melissa R. McCormick
Department CX105

**DECLARATION OF PLAINTIFF
OSCAR BENITEZ IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: February 4, 2027
Time: 2:00 p.m.
Reservation no.: 74970466
Dept: CX105

Complaint Filed: February 25, 2025
FAC Filed: April 9, 2025
SAC Filed: July 8, 2026
Trial Date: Not Set

DECLARATION OF OSCAR BENITEZ

I, Oscar Benitez, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am one of the named plaintiffs 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 Defendant Rapid Manufacturing, LCR ("Defendant") as an hourly-paid, non-exempt Warehouse Clerk from approximately December 2019 through approximately July 2022.

3. Because I thought the practices at Defendant may not be lawful, I decided to seek legal advice about my work experiences at Defendant and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps to make sure Defendant was held accountable for not properly compensating its employees for all hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, and what it meant to bring a class action so that I understood what I was considering doing.

4. I have regularly conferred with my attorneys regarding the case as part of my responsibilities as a class representative. This process included searching for and providing documents concerning my employment with Defendant, answering any questions my attorneys had about the documents, providing information regarding the company's practices and the duties of other hourly-paid and/or non-exempt employees, and helping my attorneys develop a strategy as to what additional documents and information they could seek to obtain from Defendant.

5. 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. I made myself available to answer any questions my attorneys had about Defendant's practices and treatment of its employees whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could.

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

4 7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
5 reasons. First, I understood that if the case was unsuccessful, I could potentially be responsible for
6 certain costs in the lawsuit. Second, I understood that serving as a named Plaintiff required me to
7 place my name publicly in a lawsuit against a former employer, which could potentially affect my
8 reputation and future employment opportunities. I was concerned that current or future employers
9 might view my participation negatively, even though I believed I was doing the right thing by pursuing
10 the claims on behalf of myself and other employees. Third, I understood that participating in this
11 lawsuit could require me to spend time away from work, family, and personal obligations, including
12 time spent communicating with my attorneys, reviewing documents, preparing for litigation, attending
13 mediation or court proceedings, and appearing at trial if necessary. Fourth, I understood that if the
14 case did not resolve, I could be required to testify under oath, sit for a deposition, respond to discovery,
15 and be questioned by Defendant's attorneys about my work history, my claims, and my personal
16 circumstances. Fifth, I understood that there was no guarantee that the case would succeed or that I
17 would receive any recovery for the time and effort I devoted to the lawsuit. I accepted these risks
18 because I believed it was important to pursue relief for myself and the Class. In contrast, the other
19 employees who will receive money from this lawsuit did not have to file a claim, publicly associate
20 themselves with the litigation, or take the risks that I took in bringing and pursuing this action

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

23 9. I believe that I have done everything that my attorneys have asked of me and tried, to
24 the best of my ability, to seek relief for the Class. I have spent approximately 45-50 hours participating
25 in this case as described above. I believe my efforts helped get the result obtained in this case.

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

1 my own personal interests. I understood that my role required me to assist in obtaining information
2 that would help evaluate the claims, support the litigation, and contribute to a settlement that provides
3 relief to other employees who were allegedly affected by the same or similar practices.

4 11. I understand that incentive or enhancement awards are discretionary and intended to
5 compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and
6 other employees, the financial and/or reputational risk undertaken in bringing the class action, and an
7 acknowledgment of the benefits resulting from the representative's actions. I believe my work in this
8 matter is meritorious on these points for the reasons set forth above.

9 12. I respectfully request that the Court approve and award me an Enhancement Payment
10 in the amount of \$10,000.00 for my efforts and active participation in the case and for the broader,
11 general release of all claims that I have or may have against Defendant in connection with the
12 settlement. Taking into consideration the time that I dedicated to this case, I believe that this amount
13 is reasonable.

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

15 I declare under penalty of perjury under the laws of the State of California that the foregoing
16 is true and correct. Executed on 08/06/2026, at Anaheim, California.

17
18 *Oscar Benitez*

19 Oscar Benitez
20
21
22
23
24
25
26
27
28