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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
MEGAN ELLIS 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

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1 much information as I could.

2 6. I understood that if the case did not settle, I could be required to participate in additional
3 litigation proceedings, including appearing for deposition, assisting with discovery, preparing for trial,
4 and attending trial. I understood that if the matter did not settle and proceeded to trial, I would need
5 to be in court to participate in trial and was prepared to fulfill any responsibilities necessary for the
6 lawsuit. I also understood that these responsibilities could require me to take time away from work,
7 personal obligations, and other commitments, and that this could create financial and practical burdens
8 for me.

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

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

17 9. I believe that I have done everything that my attorneys have asked of me and tried, to
18 the best of my ability, to seek relief for the Class, the PAGA Group Members, and the State of
19 California. I have spent approximately 45-50 hours participating in this case as described above. This
20 time included consulting with counsel, gathering and providing information and documents, answering
21 questions, reviewing settlement materials, discussing the settlement with my attorneys, and remaining
22 available to fulfill representative responsibilities if the matter proceeded further. This time
23 commitment was undertaken for the benefit of the Class, the PAGA Group Members, and the State of
24 California, not merely for my own individual benefit. I believe my efforts helped get the result
25 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.

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

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

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

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

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16 *Megan Ellis*

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