

WILSHIRE LAW FIRM, PLC
3055 Wilshire Blvd., 12th Floor
Los Angeles, CA 90010-1137

John G. Yslas (SBN 187324)
jyslas@wilshirelawfirm.com
Samantha A. Smith (SBN 233331)
samantha.smith@wilshirelawfirm.com
Jeffrey C. Bils (SBN 301629)
jbils@wilshirelawfirm.com
Aram Boyadjian (SBN 334009)
aboyadjian@wilshirelawfirm.com
Andrew Sandoval (SBN 346996)
andrew.sandoval@wilshirelawfirm.com
WILSHIRE LAW FIRM
3055 Wilshire Blvd., 12th Floor
Los Angeles, California 90010
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

ELECTRONICALLY FILED
Superior Court of California
County of Santa Barbara
Darrel E. Parker, Executive Officer
3/26/2025 7:56 PM
By: Sarah Sisto , Deputy

Attorneys for Plaintiff Cedric A. Beaty and Jorge L.
Zaragoza Valdovinos, individually, and on behalf of all
others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA

CEDRIC A. BEATY and JORGE L.
ZARAGOZA VALDOVINOS, individually, and
on behalf of all others similarly situated,

Plaintiff,

v.

HOMER T. HAYWARD LUMBER CO., a
California corporation; UNITED STAFFING
ASSOCIATES, LLC, a California limited
liability company; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: 22CV04267

*Assigned for all purposes to:
Hon. Donna D. Geck, Dept. 4*

**DECLARATION OF JORGE L.
ZARAGOZA VALDOVINOS IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

I, Jorge L. Zaragoza Valdovinos, hereby declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration in support of the Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for Homer T. Hayward Lumber Co. and United Staffing Associates, LLC (“Hayward”) as an hourly-paid, non-exempt employee from around August, 2019 to November, 2019.

3. Based on my experience and knowledge of Hayward’s wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on my own behalf as well as on behalf of other hourly-paid, non-exempt employees of Hayward.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to other hourly-paid, non-exempt employees of Hayward. I believe we were all subject to the same employment policies and practices.

5. I do not have any conflicts with other hourly-paid, non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid, non-exempt employees at Hayward.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid, non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by Hayward’s company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by Hayward.

7. I have always kept the best interests of the other hourly-paid, non-exempt employees in mind while performing my duties as the named plaintiff in this case. I have been committed throughout the course of this case to vigorously prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the other hourly-paid, non-exempt employees by initiating this lawsuit, providing documents and

1 information to my attorneys, keeping in regular contact with my attorneys regarding the status of
2 the case, and reviewing the settlement agreement to make sure it was fair.

3 8. I will continue to actively participate in this lawsuit as necessary and will continue
4 to make myself available to assist in this case moving forward as needed.

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

7 Executed on November 6, 2024 at Union City, California.

8 Signed by:

9 JORGE L. ZARAGOZA VALDOVINOS

10 E598CE9305CE43E...

11 Jorge L. Zaragoza Valdovinos
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28