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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

ARMANDO GALLARDO,
individually, 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; OSCAR MEZA, individually, and
on behalf of other members of the
general public similarly situated;

Plaintiffs,

vs.

L3HARRIS MARITIME SERVICES,
INC., a Delaware corporation; and
DOES 1 through 100, inclusive,
Defendant.

Case No. 3:25-cv-02552-JES-DEB

Honorable James E. Simmons Jr.
Ct. No. 4B

CLASS ACTION

**DECLARATION OF ARMANDO
GALLARDO IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL
OF CLASS ACTION AND PAGA
SETTLEMENT**

Date: October 28, 2026
Time: 9:30 a.m.
Courtroom: 4B

Complaint
Filed: July 24, 2025
FAC Filed: September 23, 2025
SAC Filed: January 7, 2026
TAC Filed: August 31, 2026
Trial Date: None Set

DECLARATION OF ARMANDO GALLARDO

I, Armando Gallardo, hereby declare as follows:

1. I am over 18 years of age and a resident of Illinois. I am a 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 L3Harris Maritime Technologies, Inc. ("Defendant") from approximately January 2017 to approximately October 2023 as an hourly-paid employee. I decided to seek legal advice about my work experiences with Defendant 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 Defendant was held accountable for not properly compensating its 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 Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid or non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and

1 their staff to make sure that they had all of my most current information and any
2 additional information that I had obtained.

3 4. Throughout this matter, I was available to answer any questions my
4 attorneys had, and available to speak and meet with my attorneys whenever they
5 needed me. I responded to them as quickly as possible and gave them as much
6 information and identified as many documents as I could. I spent time speaking with
7 my attorneys about the case, identifying potential witnesses, providing my attorneys
8 with documents and information concerning the case, and also describing policies,
9 practices, and procedures of Defendant.

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

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

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

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

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

3 Executed on this ____ day of August 2026, at Alton, Illinois.

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