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Attorneys for Plaintiffs, the Class, and Aggrieved Employees

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

TIMA HIM, as an individual and on behalf
of all others similarly situated,

Plaintiff,

vs.

WESTLAKE MANAGEMENT
SERVICES, INC., a Delaware
corporation; WESTLAKE CHEMICAL &
VINYLs LLC, a Delaware limited liability
company; WESTLAKE CHEMICAL, a
business organization, form unknown; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: STK-CV-UOE-2025-0008956

[Assigned for all purposes to the Hon. Robert T.
Waters, in Department 11B]

**DECLARATION OF CHAVEZ CANSECO IN
SUPPORT OF PLAINTIFF’S MOTION FOR
PRELIMINARY APPROVAL OF CLASS AND
REPRESENTATIVE ACTION SETTLEMENT**

Date: July 21, 22, 23, 24, or 29, 2026

Time: 9:00 a.m.

Dept.: 11B

I, Chavez Canseco, declare as follows:

1. I am an individual over the age of 18. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I was employed by Westlake Management Services, Inc. (the “Company”) from April 2022 to on or about April 28, 2025, during which time I worked as a non-exempt hourly Electrician.

3. During my employment with Defendant, I allege that Defendant underpaid overtime wages. Specifically, I understand that Defendant failed to incorporate non-discretionary remuneration, such as incentives, bonuses, and shift differentials, earned in the same period, into the overtime regular rate of pay.

4. During my employment with Defendant, I also allege that Defendant underpaid meal and rest period premiums to me. Specifically, I allege that Defendant failed to incorporate non-discretionary remuneration, such as incentives, bonuses, and shift differentials, earned in the same period, into the meal and rest period premium regular rate of pay. I also allege that Defendant underpaid sick pay wages to me.

5. Lastly, I allege that Defendant issued inaccurate wage statements to me during my employment.

6. I understand that this action was brought on behalf of a group of current and former non-exempt employees of the Company who performed work in the State of California. As the proposed class representative, I understand that it is my duty to represent the best interests of the class, know about the lawsuit, help my attorneys, and keep updated on the case. I also understand that it is my responsibility to act in the best interests of the class and not my own. I agree that I will not put my own interests ahead of that of the class, and that I will not settle my wage and hour claims separately or independently from the class.

7. Moreover, I am not aware of any conflicts that exist between my interests and the interests of the class that would impair or affect my ability to serve as representative for the class.

1 8. I have invested a lot of personal time and energy while this lawsuit has been
2 pending. I had multiple meetings and phone calls with my attorneys regarding my experience,
3 the Company's practices, and developments with the case. I also spent time searching for
4 documents, such as employee handbooks, my personnel file, and wage statements. I made it a
5 priority to be actively involved because I wanted to do everything I could to assist my attorneys
6 in prosecuting this case.

7 9. I have and continue to be willing to assist in the investigation of this matter,
8 including meeting and discussing the case with my attorneys, providing any necessary
9 information and documents, reviewing any necessary documents, remaining available for
10 mediation, making myself available for trial or any further proceedings in this matter as required
11 to represent the interests of the class.

12 10. I have reviewed the Joint Stipulation of Class Action and PAGA Settlement
13 ("Agreement") and discussed its terms with my attorneys, and based on the information
14 provided, I believe the settlement to be fair, adequate, and reasonable for myself and for the
15 entire class.

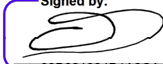
16 11. I am proud of the result and accomplishment of this lawsuit. I feel that it is a
17 positive accomplishment and understand that other people will benefit because of the actions that
18 I have taken. I believe that the settlement is fair, adequate, and reasonable.

19 12. I did not make the decision to file a class action lightly. I was concerned by the
20 attention a publicly filed lawsuit, and especially a class action, would attract. My name would be
21 associated with a lawsuit that I filed against my former employer. I am mindful that prospective
22 employers might find out that I sued the Company, and this could hurt my employability.
23 Nevertheless, I felt that important rights were at stake that hurt everyone, and I wanted to do
24 something about it.

25 13. I respectfully request that the Court award the requested \$10,000, Class
26 Representative Service Payment. I believe this amount is fair compensation for my time and
27 effort on this case, for helping to prosecute this case, and the risks with respect to my future
28

1 employment.

2 I declare under penalty of perjury under the laws of the State of California that the
3 foregoing is true and correct. Executed on June 9, 2026, at Celso Chavez, California.

4
5 
6 Signed by:
7 03B621934B1A8CA...
8 Chavez Canseco