

BURKHALTER KESSLER CLEMENT & GEORGE LLP
Daniel J. Kessler, Esq., Bar No. 173710
Email: dkessler@bkcgllaw.com
Ros M. Lockwood, Esq., Bar No. 194718
Email: rlockwood@bkcgllaw.com
Michael P. McConnell, Esq. Bar No. 317981
Email: mmcconnell@bkcgllaw.com
2020 Main Street, Suite 600
Irvine, California 92614
Telephone: (949) 975-7500
Facsimile: (949) 975-7501

Attorneys for Defendants, Nikkiso America, Inc.; ACD, LLC; Cryogenic Industries, Inc.; Cryogenic Industries Service Companies, LLC; Cryoquip, LLC; and Cosmodyne, LLC

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY RIVERSIDE**

CARLOS FLORES, individually, on a
representative basis, and on behalf of all others
similarly situated;

Plaintiff,

vs.

NIKKISO AMERICA, INC., a Delaware
Corporation; ACD, LLC, a California Limited
Liability Company; CRYOGENIC INDUSTRIES,
INC., a Delaware Corporation; CRYOGENIC
INDUSTRIES SERVICE COMPANIES, LLC, a
California Limited Liability Company;
CRYOQUIP, LLC, a California Limited Liability
Company; COSMODYNE, LLC, a California
Limited Liability Company; and DOES 1 through
20, inclusive,

Defendants.

CASE NO.: CVRI2204626

Assigned For All Purposes:
Hon. Harold W. Hopp
Department: 1

**DECLARATION OF ROS M. LOCKWOOD,
ESQ.**

Complaint Filed: October 25, 2022
Amended Complaint Filed: November 22, 2022
Trial date: Not yet set

DECLARATION OF ROS M. LOCKWOOD, ESQ.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

1. I am an attorney at law duly admitted to practice before all of the courts of the State of California. I am a senior associate attorney at Burkhalter Kessler Clement & George, LLP, counsel of record for Defendants Nikkiso America, Inc.; ACD, LLC; Cryogenic Industries, Inc.; Cryogenic Industries Service Companies, LLC; Cryoquip, LLC; and Cosmodyne, LLC.

2. I am unaware of any class, representative or other collective action in any other court in this or any other jurisdiction that asserts claims similar to those asserted in this action on behalf of a class or group of individuals some or all of whom would also be members of the class defined in this action.

I declare, under penalty of perjury of the laws of the State of California, that the foregoing is true and correct. Executed on May 22, 2024 at Irvine, California.

2

DECLARATION OF ROS M. LOCKWOOD, ESQ.