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Attorneys for Plaintiffs, similarly situated individuals, and Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**
**FOR THE COUNTY OF LOS ANGELES**

LESLIE MORALES, individually and on behalf of other members of the general public similarly situated and as an Aggrieved Employee pursuant to the Private Attorneys General Act ("PAGA"); and BRIANNA TORRES-CERVANTES, individually and on behalf of other members of the general public similarly situated,

Plaintiffs,

v.

HUGHES-NELSON PAINTING, INC. d/b/a APEX IMAGING SERVICES INC., a California Corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No: 25STCV16345

**DECLARATION OF LESLIE MORALES IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Hon. Timothy P. Dillon
Dept. 15
Date: October 20, 2026
Time: 10:00 A.M.


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I, Leslie Morales, declare and state as follows:

1. I am over the age of 18 and have personal knowledge of the facts set forth in this declaration, and if called as a witness could and would testify competently to them.

2. I was employed by Defendant Hughes-Nelson Painting, Inc. d/b/a Apex Imaging Services Inc. at its Pomona, California corporate campus from approximately August 2022 to September 2024. My position was Project Coordinator. Defendant classified my position as exempt and paid me a fixed salary. My job duties included reporting on meetings between team members and clients, communicating with team members and clients about the status of projects, ordering materials, and corresponding with vendors by email. Defendant did not record my hours worked, and I did not receive overtime pay, meal or rest period premiums, or reimbursement for using my personal cell phone for work.

3. I am a Named Plaintiff and prospective Class Representative in this action. Before this case was filed, I first spoke with Lawyers for Employee and Consumer Rights, APC about my potential claims. During that conversation we discussed the details of my job duties and my pay, and I was asked questions about how I was classified and how I was paid.

4. My matter was then referred to Harlan Hillier DiGiacco LLP. I spoke with my attorneys at that firm about the possibility of bringing a wage and hour class action and a representative action under the Private Attorneys General Act ("PAGA"). My attorneys explained what it means to be a named plaintiff, a class representative, and a PAGA representative, including that I would be acting on behalf of other employees and would owe duties to them.

5. Following those conversations, I had several additional discussions with my attorneys about my claims. I gathered documents relating to my employment with Defendant and sent them to my attorneys. I took the time to carefully review a representation agreement that described the obligations I was agreeing to take on in representing the class.

6. On June 3, 2025, my attorneys sent written notice of the alleged Labor Code violations to the Labor and Workforce Development Agency and to Defendant on my behalf. I authorized that notice and understood that it was required before a PAGA claim could be brought. I later authorized an Amended PAGA Notification, which my attorneys submitted on May 8, 2026.


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7. Before the Complaint was filed on June 5, 2025, my attorneys sent me a draft, which I reviewed. I provided feedback and confirmed that the facts stated about my employment were accurate.

8. In total, through the filing of the Complaint, I spent approximately 15 hours working with my attorneys to prepare the case for filing, reviewing my obligations as a class representative, and informing myself about the process. Searching through my employment documents and providing them to my attorneys was time-consuming, and I estimate that I spent approximately 8 additional hours on that task.

9. As the case continued, I corresponded regularly with my attorneys about the factual support for my claims, the documents and evidence supporting them, and case updates. I promptly answered their questions and made myself available when they needed information from me. In total, I estimate that I spent approximately 7 hours corresponding with my attorneys about the factual support for my claims.

10. As my attorneys prepared for mediation, they reached out to me with questions, which I answered promptly. On March 19, 2026, I was available throughout the mediation to assist with anything my attorneys needed for the mediation and settlement efforts.

11. In the weeks that followed, I communicated with my attorneys about the preparation of a formal settlement agreement. I reviewed the Settlement Agreement, discussed it with my attorneys, and signed it on May 21, 2026. In total, I estimate that I spent approximately 10 hours on mediation preparation, the mediation itself, and review of the settlement documents.

12. After the settlement was reached, I communicated with my attorneys about the preliminary approval motion and the issuance of notice to the Class. I discussed the contents of this declaration with my attorneys in detail, and I reviewed and commented on it to ensure its accuracy.

13. I estimate that I have spent approximately 40 hours in total serving as a Class Representative in this case. That estimate does not include any additional time I may spend depending on the Court's ruling on this Motion, the later filing of the Motion for Final Approval, or any issues requiring my involvement in the distribution of settlement funds.


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14. Throughout this litigation I promptly responded to my attorneys' calls and emails for information or input about the case. I believe I have done everything my attorneys asked of me and have tried, to the best of my ability, to represent the Class. I believe my efforts helped obtain the result reached in this matter. I respectfully request that the Court award me a Class Representative Service Payment of $5,000.00 for my participation. Taking into account the time I have dedicated to this matter and the value I believe I added, I believe that amount is reasonable.

15. I believe the settlement reached in this case is a good result for the Class and is in the best interests of the Class Members and the aggrieved employees.

16. Serving as a Class Representative has caused me some apprehension. I have worried that being a Named Plaintiff in this action could adversely affect my career and my ability to find future employment. That worry has been outweighed by my desire to obtain a fair result for the people I worked with who I believe were affected in the same way.

17. I understand that, in exchange for the Class Representative Service Payment, I am giving Defendant a general release of all claims, known and unknown, arising out of my employment, including a waiver of my rights under California Civil Code section 1542. My attorneys explained the effect of that waiver to me. I understand that this release is broader than the release given by other Class Members, and I agree to it.

18. I am aware that Harlan Hillier DiGiacco LLP and Lawyers for Employee and Consumer Rights, APC have an agreement to divide any attorneys' fees the Court awards in this case, seventy-five percent to Harlan Hillier DiGiacco LLP and twenty-five percent to Lawyers for Employee and Consumer Rights, APC. That agreement and the firms participating in it were disclosed to me in writing, and I have given my written and signed consent to it.

19. I am not related to, and have no business relationship with, anyone associated with Harlan Hillier DiGiacco LLP or Lawyers for Employee and Consumer Rights, APC.

20. I have not entered into any undisclosed agreements, and I have not received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as a Class Representative Service Payment, together with my own Individual Class Payment and Individual PAGA Payment as a Class Member and aggrieved employee.


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21. I understand my responsibilities as a Class Representative, I have agreed to act in that role, and I will continue to serve in that role through the conclusion of this case.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on August 28, 2026, in Los Angeles, California.



Leslie Morales


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