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Attorneys for Plaintiff STANLEY RENE

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF RIVERSIDE

STANLEY RENE, an individual, on behalf of
himself and on behalf of all persons similarly
situated,

Plaintiff,

v.

KOCH FILTER CORPORATION, a Kentucky
Corporation; and DOES 1-50, Inclusive;

Defendant.

Case No. CVRI2300700

**DECLARATION OF STANLEY RENE IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PAGA ACTION SETTLEMENT**

Date: October 3, 2024
Time: 8:30 a.m.

Judge: Hon. Harold W. Hopp
Dept.: 1
Reservation #: 972551561962

1 I, Stanley Rene declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am the named Plaintiff in the above
4 wage and hour class and PAGA action filed against KOCH FILTER CORPORATION (hereinafter
5 “Defendant”).

6 2. This declaration is being submitted in support of Plaintiff’s Motion for Preliminary
7 Approval of PAGA and Class Action Settlement.

8 3. I believe that I am, have been and will continue to represent the interests of the class fairly
9 and adequately. I have claims that are typical of the claims the Class Members that I am seeking to
10 represent.

11 4. I have worked for Defendant as a non-exempt employee since November 2015. At all
12 times during my employment, I earned an hourly wage and was entitled to legally compliant meal and/or
13 rest periods, and minimum, regular and overtime wages for all hours worked. Throughout my
14 employment, I was subject to Defendant’s written policies and procedures.

15 5. Generally, my lawsuit claims that Defendant failed to provide compliant meal and rest
16 periods, failed to pay for all time worked, failed to reimburse necessary business expenses, failed to
17 furnish accurate, itemized wage statements, and failed to pay all wages when due. Defendant denies
18 liability for each of Plaintiff’s claims.

19 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
20 to represent because I was subject to the same alleged unlawful employment policies and practices at
21 issue in this action, including but not limited to, Defendant’s failure to provide compliant meal and rest
22 periods, failure to pay for all hours worked, failure to issue accurate itemized wage statements, failure
23 to timely pay wages, and failure to reimburse necessary business expenses. Factually, Defendant’s
24 policies and practices apply class wide, and Defendant’s liability can be determined by facts common
25 to all members of the Class.

26 7. Further, there is no conflict between my interests and the interests of the class that I am
27 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that
28 I was injured by the same company-wide policies and practices to which the proposed Class was

1 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
2 of the Class by initiating this litigation and evaluating the proposed settlement to assure that it is fair.

3 8. I understood at the time that I filed this action, that as a Class Representative, I owed a
4 duty to the putative class members to faithfully prosecute this action with their best interests at the
5 forefront of every decision. I understood that I could not make any decision in this action for the sole
6 benefit of my personal interest. I understood that in executing this duty, I might have been asked to
7 sacrifice my personal best interests for the benefit of the interests of the putative class members.
8 Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible
9 relief for my former co-workers for what I perceived to be Defendant's unlawful wage and hour
10 practices. I believe that I faithfully executed the duties of a Class Representative throughout this
11 litigation and will continue to do until this litigation is fully and finally resolved.

12 9. I believe that the proposed settlement before the Court is fair, reasonable and adequate,
13 and made in the best interest of the Settlement Class Members. Consequently, I respectfully, and
14 humbly, ask the Court to grant preliminary approval of the Settlement and all of its terms.

15 **Plaintiff's Individual Claims**

16 10. Throughout my employment with Defendant, I experienced sexual harassment,
17 retaliation, and racial discrimination ("Individual Claims"). I am an African American male.

18 11. Throughout my employment, a group of Defendant's employees made monkey sounds
19 around me. As the only African American employee, these noises could not be targeted at anyone else.
20 I reported these occurrences to Defendant's Human Resources, but my reports fell on deaf ears and the
21 harassment and discrimination continued.

22 12. During the Summer 2021, one of Defendant's employees groped me on various parts of
23 my body. This was not a singular occurrence. I was inappropriately touched multiple times throughout
24 my employment with Defendant. Again, my reports fell on deaf ears and the harassment continued.

25 13. On multiple occasions throughout my employment, Defendant has taken disciplinary
26 actions against me after engaging in protected activities. Specifically, in 2021, I reported safety concerns
27 regarding the workplace, including information about my sexual harassment experience.

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14. Further, in early 2023, I was discouraged to apply for a promotion by Defendant's supervisors and managers who lied about the compensation of the new title to convince me not to apply.

15. On April 9, 2024, I filed a complaint of discrimination with the California Department of Fair Employment and Housing and received a “right to sue,” thereby exhausting my administrative remedies.

16. As a result of the discrimination, harassment, and discouragement to apply for a promotion, I believe my damages range from \$8,000 to \$12,000. This range excludes non-economic damages, such as emotional distress damages and putative damages. In connection with my Individual Claims, I have negotiated a \$10,000.00 settlement with Defendant in exchange for a broad general 1542 release. I believe my individual settlement represents a reasonable compromise for the harassment and discrimination I have endured. The reasonableness of my individual settlement amount is evidence of the absence of conflict for me and my counsel with respect to the class.

17. Once preliminary approval of the Settlement is granted, my counsel will file a formal motion for the negotiation Class Representative Service Award. This motion will be accompanied by a further declaration from me that describes the services I performed to prosecute this action, includes an estimate of time I spent performing these services, the risks I assumed or benefits I received in prosecuting this action. This declaration will also identify any adverse consequences I suffered in prosecuting this action.

18. I am not a named plaintiff in any other class or PAGA case, pending or closed.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 9/9/2024, at Riverside, California.

By: STANLEY RENE (Sep 9, 2024 14:43 PDT)
STANLEY RENE