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FERNANDO PULIDO, individually, and on
behalf of all others similarly situated

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

FERNANDO PULIDO, an individual, on behalf
of himself and all others similarly situated,

Plaintiff,

vs.

ANDREW LAUREN SURFACES, INC., a
California corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 23STCV04800

[Assigned for all purposes to the
Hon. Stephen P. Pfahler, Dept. 68]

**DECLARATION OF PLAINTIFF
FERNANDO PULIDO IN SUPPORT OF
PLAINTIFF'S MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

RESERVATION ID: 772876167670

Date: June 11, 2025

Time: 8:30 a.m.

Dept: 68

Complaint filed: March 3, 2023

Trial Date: None Set

DECLARATION OF FERNANDO PULIDO

I, Fernando Pulido, hereby declare as follows:

1. I am the named plaintiff in the above-entitled action, *Pulido, et al. v. Andrew Lauren Surfaces, Inc., et al.*, Los Angeles County Superior Court, Case No. 23STCV04800. I make this declaration on the basis of personal firsthand knowledge, except as to those matters stated on information and belief. If called as a witness, I could and would readily and competently testify to all matters stated within.

2. I make this declaration in support of Plaintiff's Motion for Approval of PAGA Settlement.

3. I was employed by Defendant Andrew Lauren Surfaces, Inc. ("Defendant") as a Laborer in June 2021 and August and September of 2022. I worked for Defendant at various job sites in Los Angeles and Orange County. As a Laborer, my primary job duties included gathering tools for installers, lifting countertops, installing marble and silicon countertops, and installing sinks in restrooms.

4. I brought this action under the California Labor Code Private Attorneys General Act of 2004 ("PAGA"). I have acted as a representative of the state of California and on behalf of other non-exempt aggrieved employees of Defendant.

5. I have spent approximately 50 hours on this case, including, but not limited to: in-person and telephonic meetings with my attorneys, searching for and producing relevant documents, preparing for and responding to questions from my attorneys in preparation for mediation, and reviewing the settlement agreement with my attorneys to ensure that its terms are fair and achieve PAGA's objectives.

6. I fully realized the risks I would be taking by pursuing this action as a PAGA representative. I knew that my future employer might conduct a background check on me or otherwise find out about my participation in a lawsuit against a previous employer and might retaliate against me as a result. I also knew that, as a PAGA representative, I would be bearing risks that other aggrieved employees would not be facing.

7. I also knew that I placed myself at a substantial risk because if Defendant were to

1 prevail in this action, I could have been liable for Defendant's litigation costs. Yet I felt so
2 strongly about standing up for the rights of Defendant's employees that I initiated and
3 participated fully in this lawsuit.

4 8. From the time I became a PAGA representative in this litigation, I took an active
5 role in participating in decisions concerning the case, including settlement. I maintained regular
6 contact with my attorneys, via phone and in person, to give them additional information and to
7 keep myself informed of the developments in the case. I made sure that I understood everything
8 that was going on in the case so I could make the best informed decisions on behalf of the state
9 and other aggrieved employees.

10 9. I believe that the requested \$10,000.00 Representative Service Payment for
11 serving as a PAGA representative is reasonable given the substantial time and effort I have
12 expended on behalf of the other aggrieved employees and the risks I faced in serving as a named
13 plaintiff. As part of the Settlement, I am releasing my individual wage and hour claims against
14 Defendant and waiving my rights under Civil Code § 1542 as to any and all claims against
15 Defendant with the exception of my individual action pending in Los Angeles Superior Court,
16 Case No. 23STCV15739. I believe that I should receive a service payment, in part, because this is
17 a more comprehensive release than the release that is applicable to the other aggrieved
18 employees.

19 10. Moreover, based on my information and belief, over 90 aggrieved employees will
20 be able to recover penalties for the alleged wage and hour violations. Because I put myself on the
21 line, each aggrieved employee did not have to expend his or her own time and resources to pursue
22 legal remedies individually. This action would not have been possible without my active
23 participation and my willingness to place myself at risk for the sake of the other aggrieved
24 employees. In addition, the LWDA will receive approximately \$152,250.45 as 75 percent of the
25 PAGA Penalties, which is a substantial amount to punish Defendant for the alleged Labor Code
26 violations, to deter future violations, and to assist the LWDA with the enforcement of labor laws.

27 11. I know that without my efforts, this lawsuit would not have been brought on behalf
28 of the aggrieved employees of Defendant and aggrieved employees would not have received

1 payment for civil penalties. Throughout the entire litigation, I did the best that I could to represent
2 the state and other aggrieved employees and to look out for their interests.

3 I declare under penalty of perjury under the laws of the State of California that the
4 foregoing is true and correct. Executed on Dec. 13, 2024 at Bellflower,
5 California.

6 
7 Fernando Pulido (Dec 13, 2024 11:58 PST)
8 FERNANDO PULIDO