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Attorneys for Plaintiffs,
CARLOS PEREZ-GARCIA, SAUL RAMIREZ, ADELA ROBLES, MARGARITA ROBLES, MARIA REYES, MARIO LOPEZ, and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO – NORTH COUNTY
(*UNLIMITED JURISDICTION*)

CARLOS PEREZ-GARCIA, SAUL RAMIREZ, ADELA ROBLES, MARGARITA ROBLES, MARIA REYES, and MARIO LOPEZ, on behalf of themselves and all others similarly situated, and the general public, and as "Aggrieved Employees" on behalf of other "Aggrieved Employees" under the Private Attorneys General Act of 2004,

Plaintiffs,

vs.

SYSTEMS MACHINES AUTOMATION COMPONENTS CORPORATION; EDWARD NEFF, an individual; and DOES 1 to 25, inclusive,

Defendants.

Case No.: 25CU050624N

DECLARATION OF CARLOS PEREZ-GARCIA IN SUPPORT OF PLAINTIFFS' MOTION FOR APPROVAL OF PAGA SETTLEMENT

Action filed:	09/22/2025
Hearing Date:	11/06/2026
Hearing Time:	1:30 p.m.
Hearing Dept:	N-31, Hon. Victor M. Torres

DECLARATION OF CARLOS PEREZ-GARCIA

I, CARLOS PEREZ-GARCIA, declare and state as follows:

1. I am a resident of the State of California and am over 18 years of age. I am one of the named Plaintiffs in this action and am represented by Maralle Messrelian of MM Law, APC in this action. Except as otherwise stated, I have personal knowledge of all matters set forth in this declaration and could and would competently testify thereto if called upon to do so as a witness.

2. I first started working for Defendant Systems Machines Automation Components Corporation ("SMAC") on or around September 5, 2000 at its facility located at 5807 Van Allen Way, Carlsbad, CA 92008. During my employment, my job title was "Machine Operator" and later "Assembler". My employment ended on or around June 30, 2025.

3. I understand that this lawsuit is a Private Attorney General action, otherwise known as a PAGA lawsuit. I understand that I am one of the Plaintiffs and that SMAC is the Defendant. I understand that my name is on the cover of the lawsuit. I understand that I am one of the representatives of other SMAC employees. As a representative in this lawsuit, I have duties to the State of California and other employees like me who were not paid for all hours worked at the correct rates of pay, provided all required meal and rest periods, and reimbursed for necessary business expenses, such as uniform, personal protective equipment and tool expenses. I also understand that my lawsuit is on behalf of the State of California. I have fairly represented the other employees and the State throughout this lawsuit. I don't have any disagreements with the other SMAC employees I represent. I am not aware of any reason why I can't make the best decisions for them in this lawsuit.

4. When I agreed to hire my attorneys to file this lawsuit, I also agreed that I would be the representative of the other employees and the State of California. I agreed that the interests of the other employees and the State in the lawsuit are as important as my personal interests in suing SMAC. I agreed that I would do what is in the best interest of the other employees and the State when deciding whether or not to settle this lawsuit. I also agreed to actively participate in the lawsuit. I also understand that there will only be a settlement of the lawsuit if the Court allows it.

5. The PAGA statute does not forbid service awards. Courts frequently award them in PAGA-only cases as well. The work I have done on this case includes hiring my attorneys,

speaking with my attorneys on many occasions by phone, explaining what my employment at SMAC was like, explaining what my employment at SMAC had in common with other employees who worked for SMAC, explaining my claims to my attorneys, and communicating with my attorneys about the settlement agreement and related documents. Despite this, I am not asking for a service award for my involvement and the time I spent assisting my counsel with the PAGA action.

6. I negotiated an individual settlement for my individual claims against SMAC.

7. As part of my individual settlement, I signed a general release of all claims, whether known or unknown, that I may have against Defendant, other than the PAGA claims.

8. I don't believe that my individual settlement has any bearing on whether I have served the Aggrieved Employees' best interests and will continue to do so. Nevertheless, I am willing to provide it to the Court *in camera* if the Court so requests.

I declare under the penalty of perjury of the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed on October 13, 2026 at Vista, California.

Carlos Pérez Garcia

Carlos Pérez Garcia (Oct 13, 2026 10:50:30 PDT)

CARLOS PEREZ-GARCIA,
Declarant