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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

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

ESTEBAN ALDANA, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

CORESLAB STRUCTURES (L.A.) INC.,
a California Corporation; and DOES 1
through 20, inclusive;

Defendants.

Case No.: CVRI2300287
*[Assigned to Hon. Harold Hopp, Dept 1, for all
purposes]*

**DECLARATION OF PLAINTIFF ESTEBAN
ALDANA IN SUPPORT OF MOTION FOR
FINAL APPROVAL**

I, Esteban Aldana, state and declare:

1. I am the Plaintiff in the above captioned action and have personal knowledge of
all matters stated herein and could competently testify thereto.

2. I make this declaration in support of the motion for final approval of the class
action settlement. I believe that the settlement is fair and reasonable and constitutes a fair
resolution of the claims alleged.

3. During my employment with Coreslab, there were several issues that concerned
me and which I thought did not comply with California law, such as not being paid properly and
not getting proper meal periods and rest breaks. Even though I was unsure if I wanted to bring a

lawsuit because of the risk of stepping forward as a whistle blower (since, as a current employee, this could jeopardize my job and livelihood in the industry and make it difficult to find future jobs), I retained Lauby, Mankin & Lauby LLP to proceed with this class action because I did not think that myself or the other employees were being treated correctly.

4. When I first retained my attorneys (Lauby, Mankin & Lauby) and chose to pursue this case on a class action basis, I understood that I had specific burdens as the “Class Representative,” which included: (a) representing the interests of all class members, (2) considering the interests of all class members above my own personal interests, (3) participating actively in the lawsuit, including potential testimony at deposition and trial, and keeping generally aware of the status and progress of the lawsuit. Moreover, I understood that any resolution of the lawsuit is subject to court approval and must be designed in the best interests of the class as a whole.

5. The settlement administrator advised that my current estimated shares of this settlement are as follows: \$4,436.23 as my Individual Class Payment, and \$144.91 as my Individual PAGA Payment. The Parties have also agreed to a service award (subject to this Court’s approval) of \$7,500. I respectfully request that the Court approve the full service award requested for the following reasons.

6. First, by bringing this case (and doing so as a class action), I undertook significant risks and stresses at a high emotional cost without any guarantee of success. After all, I brought this case while I was still employed at Coreslab (and I am still a current employee there). For that reason, filing this lawsuit and being a whistle blower was stressful on a day-to-day basis as I have constantly worried about the risk that this case could impact my job at Coreslab. Yet I still agreed to step forward to bring these claims, hoping to make a positive change and recover what my coworkers and I were owed, all while knowing that the company might retaliate against me for doing so. And, unfortunately, that is exactly what happened as I believe the company has been retaliating against me and mistreating me for months now, and I have had to make several complaints and open a union grievance in this respect. As such, the risk/stress of bringing this

lawsuit did not only last up until we settled – the risk/stress is ongoing even now, and I’m worried that the fact I filed this case may make it hard to find a job in the future since the case information is all available online.

7. Second, as outlined above, I have spent substantial time working on this case and have performed substantial services for the Class to help obtain a highly beneficial settlement for my fellow employees. Since first initiating this action, I estimate that I have spent at least 60 hours engaged in activities to benefit the class. I have assisted my attorneys in numerous ways, including helping to explain and discuss the company’s practices and their general practices and procedures, locating and analyzing company documents, and communicating with other class members. These efforts occurred through numerous meetings with Class Counsel, telephone conferences, letters, emails, and text communications. I also assisted in preparation for mediation helped obtain a positive result for the class and reviewed all settlement documents.

8. Third, I respectfully request that the Court approve the agreed-upon service award because I agreed to set aside my personal interests and to put the interests of the class ahead or on par with my own. In doing so, and by successfully bringing this case as a class action, I helped to obtain a highly beneficial settlement for the class members.

9. Fourth, as a condition of this class action settlement, I was required to release and waive all possible individual claims against the company – something that none of the other class members were required to give up. And this was especially difficult given the retaliation I am facing for bringing this lawsuit, discussed in more detail below.

10. Fifth, bringing this case also came with a major financial risk because, if I lost the case, I would be required to pay the company’s costs, which could be over \$10,000.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 29, 2024, at Corona, California.

By: 
Esteban aldana (May 29, 2024 11:18 PDT)
Esteban Aldana