

1 James R. Hawkins (SBN 192925)
Christina M. Lucio (SBN 253677)
2 JAMES HAWKINS APLC
9880 Research Drive, Suite 200
3 Irvine, California 92618
Telephone: (949) 387-7200
4 Facsimile: (949) 387-6676
James@Jameshawkinsaplc.com
5 Christina@Jameshawkinsaplc.com

6 Attorneys for Plaintiff LOUIS C BERREYES
on behalf of himself and all others similarly situated
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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF SAN BERNARDINO**

11
12 LOUIS C BERREYES, on behalf of themselves
and all others similarly situated,

13 Plaintiffs,

14 v.

15 SOUTHERN CALIFORNIA GAS COMPANY, a
16 California Corporation and DOES 1-5- inclusive,

17 Defendants.
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Case No. CIVSB2207291

Assigned for all purposes to
Hon. Joseph T. Ortiz
Dept. S-17

**DECLARATION OF LOUIS BERREYES IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

1 I, Louis Berreyes, declare as follows:

2 1. I am an individual over the age of 18 and the named plaintiff in this matter. I am seeking
3 to be named the Class Representative in this class action lawsuit against my former employer,
4 Defendant Southern California Gas Company, a California Corporation. ("Defendant"). I have
5 personal knowledge of all facts stated in this declaration and, if called to testify, I could and
6 would testify competently thereto. This declaration is submitted in support of approval of the
7 proposed class action settlement ("Settlement") reached in this case.

8 2. I was employed by Defendant as a Meter Reader, and later as a Field Service Assistant
9 from approximately December 2000 through 2021. I was based out of Defendant's San
10 Bernardino facility. My primary responsibilities were inspecting, reading, and recording gas
11 meters. As Field Service Assistance, my primary responsibilities were inspecting, maintaining,
12 and repairing gas equipment at customer locations.

13 3. Because I thought my former employer's practices may not be lawful, I decided to seek
14 legal advice about my work experiences and about filing a lawsuit to obtain relief for my
15 grievances and potentially other employees for the same grievances. I was referred to James
16 Hawkins APLC and spoke with their attorneys. After speaking with the attorneys about my
17 situation and what it meant to bring a class and representative PAGA action, I decided to proceed
18 with a lawsuit against my former employer. At the time, I also agreed to represent all other
19 similarly situated employees who worked for Defendant in California in hourly-paid, non-exempt
20 customer service field positions. I decided to try to obtain relief for the entire class. I agreed to
21 serve as Class Representative and consider the Class's interests above my own.

22 4. I understood my duty as Class Representative was to actively participate in the case and
23 remain apprised of its progress. I have worked diligently to fulfill these duties by assisting my
24 attorneys in investigating and prosecuting this action on behalf of the Class.

25 5. I am aware and have been aware from the inception of the case, that there is the risk that if
26 I do not win my case, then I could be liable for Defendant's litigation costs. I accepted that risk in
27 this case. I also understood that an individual case would potentially have resolved much faster
28 than a class action and involved much less financial risk than a class action. I also understood the

1 risks of serving as Class Representative, included reputational harm that could affect future
2 employment prospects. Despite these risks and challenges, I felt obligated to pursue this case to
3 vindicate our rights..

4 6. My attorneys prepared the complaints in this action, which I carefully reviewed before
5 they were filed.

6 7. I have and continue to be willing to assist in the investigation and prosecution of this
7 matter. I have regularly conferred with my attorneys regarding the case as part of my
8 responsibilities as a class and PAGA representative. I have searched for and provided any
9 necessary information and documents to my attorneys, including my paystubs, letters and e-mails,
10 policy documents, and other employment documents; reviewed documents and pleadings in this
11 case, including my PAGA letter, the class and PAGA action complaints, the settlement
12 agreement, and this declaration; and communicated with other employees regarding their
13 experiences working at So Cal Gas. In addition, I have also agreed to make myself available for
14 any further proceedings in this matter as required to represent the interests of the Class. I also
15 understand my duties and responsibilities to the proposed Class and will continue carry out those
16 duties. I estimate that I have devoted at least 75 hours to this case since it began approximately
17 three years ago.

18 8. I routinely checked in with my attorneys and their staff to make sure that they had all my
19 most current information and any additional information that I had obtained. I made myself
20 available to answer any questions my attorneys had about Defendant's practices and treatment of
21 their employees whenever they needed me, including in connection with the complaints, while
22 responding to discovery, preparing for mediation, and during mediation. I responded to them as
23 quickly as possible and gave them as much information as I could.

24 9. My attorneys provided me with the proposed Stipulation of Class Action Settlement (the
25 "Settlement Agreement"). I reviewed the Settlement Agreement, discussed the Settlement
26 Agreement with my attorneys, and asked them questions before signing it. Based on the
27 information provided, I believe the settlement to be fair, adequate, and reasonable for myself and
28 the entire Class and the Aggrieved Employees.

1 10. I believe that I have done everything that my attorneys have asked of me and tried, to the
2 best of my ability, to seek relief for the Class, the Aggrieved Employees, and the State of
3 California. I have spent many hours participating in this matter as described above. I believe my
4 efforts were critical to achieving the result obtained in this case for the Class, the Aggrieved
5 Employees, and the State.

6 11. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive
7 accomplishment and understand that other employees, who might not receive any benefit
8 otherwise, will benefit because of the actions that I have taken. I understand that any resolution
9 of this lawsuit on a class wide basis is subject to court approval, and any settlement must be
10 designed in the best interest of the Class as a whole. At all times throughout the course of this
11 litigation I have considered the interests of the Class and put them before my own personal
12 interests.

13 12. I understand that, as part of the settlement, I will be asking the Court to approve an
14 enhancement award for me as the Class Representative. I understand that any enhancement award
15 is discretionary and intended to compensate named plaintiffs for the quality and quantity of the
16 work done on behalf of the class and other employees; the financial and/or reputational risk
17 undertaken in bringing the class and/or PAGA action, and an acknowledgment of the benefits
18 resulting from the representative's actions.

19 13. My interests are aligned with the Class and I have no conflicts. I have always prioritized
20 the Class's interests equally to my own. Serving as Class Representative has required significant
21 time and effort, and has exposed me to substantial risks as indicated above.

22 14. I believe my work in this matter is meritorious on these points for the reasons set forth
23 above. Therefore, I request that the Court preliminarily approve a Class Representative
24 Enhancement Award in the amount of \$10,000 for my efforts and active participation in the case.
25 I also note that I have executed a broader release of all claims (except with regard to a pending
26 separate suit) that I have or may have against Defendant in connection with the settlement.

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1 15. I remain committed to representing the Class through final approval of the settlement.

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3 I declare under penalty of perjury under the laws of the State of California that the foregoing is
4 true and correct.

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6 Executed on 06/23/25 in Covina, California.

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Louis Berreyes (Jun 23, 2025 13:07 PDT)

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