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Attorneys for Plaintiff RAMIRO GALVAN,
individually and on behalf of others similarly situated

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

RAMIRO GALVAN, individually and on
behalf of others similarly situated,

Plaintiff,

vs.

RENT A TOILET, INC., DALIA PALACIO,
and DOES 1 through 50,

Defendants.

CASE NO.: 23C-0050

CLASS ACTION

Assigned For All Purposes To:
Judge: Hon. Valerie R. Chrissakis
Dept.: 8

DECLARATION OF RAMIRO GALVAN

Complaint Filed: February 16, 2023

1 I, RAMIRO GALVAN, hereby declare:

2 1. I have personal knowledge of the following and if called as a witness, I could and
3 would competently testify thereto.

4 2. I am a plaintiff in this lawsuit, and I submit this declaration in support of approval
5 of the settlement of the alleged class claims and claims for civil penalties under the Labor Code
6 Private Attorneys General Act (“PAGA”) against Defendants Rent A Toilet, Inc., RAT
7 Incorporated, Dalia Palacio, and Edison Palacio (“Defendants”) in this action.

8 3. I was employed by Defendants as a non-exempt employee in California.

9 4. After my employment with Defendants ended, I contacted Majarian Law Group.
10 After an initial consultation, I spoke with Justian Jusuf of Law Office of Justian Jusuf and
11 discussed with him the employment practices of Defendants, particularly regarding work hours,
12 time record keeping practices, meal periods, rest periods, and related issues.

13 5. When I decided to start a lawsuit as a class action, I understood that I was not only
14 seeking recovery for myself, but also for all other current and former non-exempt employees who
15 had been subjected to the same employment practices. I understood that I could not put my
16 interest above those of the class members.

17 6. I also understood that I might be held responsible for some or all of Defendants’
18 costs in defending the case, if the case was not successful. Moreover, I also understood that filing
19 a lawsuit against my former employer might be considered as an act of disloyalty by other future
20 employers. Notwithstanding these risks, I was willing to go forward and represent the class.

21 7. I had numerous discussions with Mr. Jusuf before and after the filing of the
22 complaint in this action. I learned that a large amount of work was required of me as a class
23 representative and I was willing to engage in the work. I spent substantial amount of time
24 describing Defendants’ policies and practices. I spoke with Mr. Jusuf and his assistant on a
25 regular basis regarding the status of the case. I attended a full-day mediation with my attorney,
26 and participated in the discussions with the mediator.

27 8. Once the settlement was agreed upon and the settlement paperwork was finalized, I
28 reviewed the documents with my attorney and discussed the procedure, and then I signed the

1 settlement document. I believe the settlement provides substantial benefit to those employed by
2 the Defendants as non-exempt employees for the claims asserted in this action.

3 9. I have spent a total of no less than 30 (thirty hours) on this case, describing
4 Defendant's practices to my attorney, discussing the case, attending the mediation, and reviewing
5 documents.

6 10. I believe the settlement should be approved, because I believe the terms of the
7 settlement are fair and reasonable, and represent substantial benefit to the class members.

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

10 Executed on October ¹¹_____, 2024 at Turlock, California.

11
12 DocuSigned by:
13 *RAMIRO GALVAN*
14 ABAA739B8D0B495...
15 RAMIRO GALVAN