

1 Brandon Brouillette (SBN 273156)
bbrouillette@crosnerlegal.com
2 Zachary M. Crosner (SBN 272295)
zach@crosnerlegal.com
3 **CROSNER LEGAL, PC**
9440 Santa Monica Blvd., Suite 301
4 Beverly Hills, CA 90210
Tel: 1-866-276-7637
5 Fax: 310-510-6429

6 Attorneys for Plaintiff CHARLES KEOPIMPHA

7
8 **SUPERIOR COURT OF CALIFORNIA**
9 **IN AND FOR THE COUNTY OF LOS ANGELES**

10 CHARLES KEOPIMPHA, on behalf of the
11 State of California, and others similarly
situated and aggrieved,

12 Plaintiff,

13
14 v.

15 MANPOWER US INC., a Delaware
16 Corporation; MANPOWERGROUP US
INC., a Wisconsin Corporation;
17 HONEYWELL INTERNATIONAL, INC.,
a Delaware Corporation; and DOES 1-100,
18 inclusive,

19 Defendants.

Case No.: 22STCV26888 (Lead Case)
23STCV18670 (Related Case)

Assigned for All Purposes to:
Hon. Michael Schultz
Dept. 40

DECLARATION OF CHARLES KEOPIMPHA

Date: August 21, 2025
Time: 8:30 a.m.
Dept.: 40

Reservation ID: 166053299611

1 I, CHARLES KEOPIMPHA, declare as follows:

2 1. I am an adult over the age of eighteen (18) years old. I am a plaintiff in the above-
3 captioned lawsuit. I have personal knowledge of the facts set forth in this declaration. I make this
4 declaration in support of Plaintiff's Motion for Approval of Settlement under Private Attorneys
5 General Act.

6 2. I worked for Defendants Manpower and Honeywill for several months in 2022,
7 from about July 18, 2022 through October 11, 2022. The entire time I worked at Honeywell facility
8 located in Torrance, California, and was placed to work there by the Manpower staffing agency. I
9 regularly worked full time and I frequently worked over 10 or even 12 hours in a day. While
10 worked there I don't believe I was paid correctly for all the hours I worked because the company
11 would round time punches down such that I lost time, I also don't think I got all of my lunches
12 and rest breaks like I was supposed to, especially on longer shifts where I wouldn't get a second
13 lunch or a third break, and many times breaks would start late or be cut short because of the work.
14 I also was constantly using my own phone for work and would get calls and texts from
15 supervisors about work-related issues and I never received any kind of reimbursement for this.

16 3. I decided to file this lawsuit because I did not feel that I was treated fairly as an
17 employee of Defendants with regard to not being paid correctly, not getting all of my lunches and
18 breaks like I was supposed to, and not being reimbursed for using my own phone on company
19 business.

20 4. It is my understanding this lawsuit could not have been prosecuted or settled on
21 behalf of the other employees unless I or some other current or former employee decided to serve
22 as a named plaintiff and proposed PAGA representative. In deciding to serve as a named plaintiff
23 in this case, I understood that my name could be publicly attached to this lawsuit and that my
24 work experiences to some extent would be set forth in a public court file. I recognized I would
25 need to devote a certain amount of time that I could have spent otherwise. I also recognized my
26 bringing the lawsuit carried some degree of risk for defendants' legal costs among other things.
27 Despite this, I decided to serve as the named plaintiff and PAGA rep without any promise of
28 recovery or compensation.

1 5. I am familiar with the work involved in prosecuting this case. I have participated
2 in meetings, phone calls, and other communications with my lawyers regarding this case. I am
3 familiar with the allegations and defenses of the claims in this case. I am familiar with the major
4 events in this case, including the investigation performed by my lawyers, the mediation with
5 Defendants that eventually resulted in this settlement, and the preparation of settlement papers
6 and the need to obtain court approval of the proposed settlement. I participated in the litigation
7 and provided my lawyers with information and documents regarding my employment with
8 Defendant.

9 6. I believe that the proposed settlement obtained on behalf of the State and other
10 aggrieved employees is excellent in view of the issues and risks involved with the case.

11 7. I believe I have fulfilled my duties as a named plaintiff, which required a
12 significant amount of time and effort during the course of this case. These efforts required
13 dedicating numerous hours to lawsuit activities including, but not limited to: (a) communicating
14 with my attorneys to stay informed of ongoing developments in the case and to discuss the
15 proposed settlement ultimately negotiated; (b) searching for and providing documents and other
16 materials relating to my work experience; (c) responding to requests for information relating to
17 my work experience; and (d) reviewing filings and key documents including drafts of the
18 complaint and the settlement agreement. These tasks required my dedication of at least 20-25
19 hours of my time, which time I honestly could have spent on family, personal time, or work. My
20 understanding is that future tasks may require several more hours of my time. Further, at all times
21 I was ready, willing and able to testify at deposition and/or trial. I believe I have been diligent and
22 that I have acted above and beyond that of which is expected of a named plaintiff and proposed
23 class representative to date and will continue to do so.

24 8. It is my opinion that \$10,000.00 is a fair and adequate award for my service as the
25 named plaintiff and class representative, and in consideration for my general release of all claims
26 against Defendant. I believe that amount is fair and reasonable in view of the work I have and
27 may have to continue to perform. I believe that my role as the named plaintiff and PAGA
28 representative in this lawsuit has resulted in a valuable benefit to the State and to the other

1 employees, and I accepted the potential risk of being liable for the opposing parties' costs if we
2 were unsuccessful in this lawsuit. I believed in this case, so I was willing to be the named plaintiff
3 and class rep to risk this and pursue this representative litigation. I also accepted the risk that
4 news of this lawsuit could also potentially impact my ability to secure other work.

5 9. Based on the time, service, risk, stress, potential stigma, loss of benefits and
6 excellent outcome of this case, I believe the enhancement for me is fair and reasonable.

7 I declare under penalty of perjury under the laws of California that the foregoing is true
8 and correct. Executed on 06 / 17 / 2025, at Long Beach, California.

9
10 
11 CHARLES KEOPIMPHA