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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

LEOPOLDO ARIOLA, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

RAYTHEON (CA) TECHNOLOGIES
CORPORATION, a Delaware corporation;
RAYTHEON COMPANY, a Delaware
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 23STCV10195

Honorable David S. Cunningham III
Department SSC-11

CLASS ACTION

**DECLARATION OF LEOPOLDO
ARIOLA IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Complaint Filed:	May 5, 2023
FAC Filed:	February 3, 2025
Trial Date:	None Set

DECLARATION OF LEOPOLDO ARIOLA

I, Leopoldo Ariola, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned matter which involves my putative class action case entitled *Leopoldo Ariola v. Raytheon (CA) Technologies Corporation, et. al.*, Los Angeles County Superior Court, Case No. 23STCV10195 and my Private Attorneys General Act (“PAGA”) representative action case entitled *Leopoldo Ariola v. Raytheon (CA) Technologies Corporation, et. al.*, Los Angeles County Superior Court, Case No. 23TRCV01456, which were consolidated by the United States District Court for the Central District of California (with the above-captioned putative class action being deemed the master or lead case). I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I am providing this declaration to provide the Court with evidence of extraordinary circumstances to assist the Court in its decision on whether to preliminarily approve my requested Class Representative Service Award of \$22,000.00.

3. I was employed by Raytheon (CA) Technologies Corporation and Raytheon Company (together, the “Defendants”) for almost twenty years, from approximately July 2003 to approximately October 2022, as a non-exempt employee.

4. I understand that I have reached a settlement with Defendants in the above-captioned matter, which includes a release of Released Class Claims against Released Parties arising during the Class Period as a Participating Class Member, as set forth in Paragraphs 13 & 13.1 of the First Amended Joint Stipulation of Class Action and Private Attorneys General Act (“PAGA”) Settlement Agreement and Release (“First Amended Agreement”), and a release of Released PAGA Claims against Released Parties arising during the PAGA Period as an Aggrieved Employee, as set forth in Paragraphs 13 & 13.2 of the First Amended Agreement. In addition to those releases, the First Amended Agreement includes a broad general release of my individual claims against Released Parties along with a California Civil Code section 1542 waiver, as set forth in Paragraphs 13 & 13.3 of the First Amended Agreement.

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1 5. I decided to spearhead the pursuit of my putative class action case and my separate
2 PAGA action case, which were ultimately consolidated, because, while I worked for Defendants,
3 I and other putative class members and aggrieved employees experienced multiple wage and hour
4 issues. I strongly believe that I also experienced workplace harassment, retaliation, and
5 discrimination (including based on my disability and medical condition) during my employment
6 with Defendants, and that I was wrongfully and constructively terminated. I discuss this aspect of
7 my employment experience in this declaration because the First Amended Agreement would be
8 causing me to release these and other claims through my broad general release in exchange for the
9 requested service payment.

10 6. I believe that in this particular case, my individual broad release of claims is very
11 significant and constitutes extraordinary circumstances in support of my being awarded a service
12 payment in the amount of \$22,000.00.

13 7. Specifically, during my employment with Defendants, I was continuously harassed
14 by employees of Defendants who would often yell and insult me and my intelligence in an attempt
15 to humiliate me in front of my colleagues. I went to my manager at the time, and to Defendant's
16 human resources department multiple times, but nothing was done to address and resolve the
17 situation. Furthermore, during my employment with Defendants, I was diagnosed with colorectal
18 cancer for which I went on disability leave to seek treatment. I underwent surgery to remove the
19 cancer, but was later diagnosed with neuropathy as a result of the cancer and treatment. Upon my
20 return to work, despite knowing of my weakened health and condition, my manager attempted to
21 demote me to a lower-level position that involved more physical exertion, e.g., where I would be
22 forced to continuously stand for a full eight-hour shift while performing a physically exerting job.
23 I did not feel safe or capable of doing this job and once I spoke up about my medical condition
24 and health, and my concerns, I believe Defendants and my manager took steps to try to replace
25 me.

26 8. Eventually, I was forced to resign from my position, which precluded me from
27 applying for unemployment, and which made my search for a new job incredibly difficult.

28 9. As a result of these issues and what I experienced, I have suffered mental torture and
struggled with depression, anxiety, and the inability to sleep.

1 10. I worked for Defendants for nearly twenty years, and the discrimination, harassment,
2 and injustice I faced, including and not limited to my forced resignation from my job and the
3 impact on my career, robbed me of my self-worth and sense of purpose.

4 11. I ultimately decided to seek legal advice about my work experiences with
5 Defendants, about pursuing my grievances, and taking action to hold Defendants accountable. I
6 contacted Lawyers *for* Justice, PC and spoke with attorneys there. After speaking with the
7 attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into
8 the leading class action and employment law firms in California for approximately **2 hours**.
9 Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **5 hours** discussing my
10 situation, complex wage-and-hour class actions in general, and what it meant to be a named
11 plaintiff, class representative, and representative under the Private Attorneys General Act
12 (“PAGA”).

13 12. After conducting my own research and discussing my situation with attorneys at
14 Lawyers *for* Justice, PC, I decided that the best way to hold Defendants accountable for the wage-
15 and-hour violations that I and other employees suffered (e.g., not being paid for all hours worked
16 and not being provided with compliant meal and rest breaks), was to pursue class and PAGA
17 claims against Defendants.

18 13. I have put the needs and interest of the class, State of California, and aggrieved
19 employees before my own, by pursuing claims on their behalf (through my pursuit of the above-
20 captioned matter), and spending significant time and effort prosecuting the claims. Ultimately,
21 my efforts were successful in reaching a settlement for the significant sum of \$6,500,000.00.

22 14. I understand that a settlement has been reached in my case and what my duties and
23 responsibilities are as a potential class representative and PAGA representative. For example, I
24 am aware that for the PAGA claim, I am acting as a representative of the State of California to
25 seek enforcement of the California Labor Code and recovery of civil penalties for alleged
26 violations of the California Labor Code. I also understand that, if the settlement is granted
27 preliminary approval, the Court will certify a class for settlement purposes, and likely appoint me
28 as the representative of the class and my attorneys as counsel for the class. I also understand that
my duties will include checking in on, monitoring, and conferring with my attorneys to facilitate

1 the notice and settlement administration process, and to provide information that the Court needs
2 in order to assess whether the settlement is fair, reasonable, and adequate. Further, if any
3 individuals who are potential class members contact me, I will take steps to have them referred to
4 the Court-appointed settlement administrator so that these individuals may receive the necessary
5 information and notice that they may be eligible to receive in connection with the settlement and
6 contemplated final approval hearing.

7 15. I believe that I have tried, to the best of my ability, to represent the class and pursue
8 relief on behalf of other class members and to also represent the State of California and pursue
9 civil penalties under PAGA. I have volunteered to represent and champion the interests of many
10 other people with similar claims and injuries because of the importance of the case and the
11 necessity that all class members benefit from the lawsuits equally. I understand that as a proposed
12 class representative, and if formally appointed as a class representative, I have and continue to
13 represent the interests of all members of the class in litigation to recover relief for the class. As an
14 non-exempt employee of Defendants who was subject to the same policies, practices, and
15 procedures as the other members of the class, I have claims that are typical of those of the class. I
16 understand that any resolution of the above-captioned lawsuit is subject to Court approval and
17 must be in the best interest of the class as a whole. I have participated, and continue to participate,
18 in the above-captioned lawsuit as necessary. I have actively followed and monitored the progress
19 of the cases, and have taken steps to make sure that the litigation is prosecuted by the skilled and
20 effective attorneys that I have retained.

21 16. On top of my release of the wage-and-hour class action and PAGA claims, the
22 settlement provides for a broad general release of my individual claims, with a California Civil
23 Code section 1542 waiver, and I am aware that this is a material term and condition of the
24 settlement, which no other Participating Class Member or Aggrieved Employees will be providing
25 in this settlement. I believe that the contemplated \$22,000.00 service payment that I am requesting
26 is appropriate based on the services I performed as a class and PAGA representative and for the
27 broad general release of individuals claims that I am providing, relating to my traumatic
28 experiences during my employment with Defendants, including and not limited to, claims for
harassment, retaliation, discrimination, wrongful termination, and emotional distress. In light of

1 what I have experienced, and the significant sum of \$6,500,000 that is being recovered for the
2 benefit of others, as a result of and through the lawsuits that I initiated, I believe that my receipt
3 of a \$22,000.00 service payment is reasonable and warranted.

4 17. I do not believe that I have any conflicts of interest with the class, including and not
5 limited to, because of what I experienced during my employment as it pertains to non-wage-and-
6 hour issues, nor does Defendants providing me nominal compensation in exchange for getting the
7 benefit of my broad general release of individual claims, place me in a position of conflict.

8 18. Further, with respect to the above-captioned wage-and-hour class and PAGA action,
9 I have spent over **16 hours** meeting with my attorneys regarding the matter and fulfilling my
10 responsibilities as a named plaintiff, class representative, and PAGA representative, which
11 included gathering documents concerning my employment with Defendants, reviewing documents
12 with my attorneys and answering their questions, providing information regarding the duties of
13 non-exempt employees, and helping develop a strategy as to what documents and information to
14 obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that
15 they had all of my most current information and any additional information that I had obtained.

16 19. As the matter progressed, I was available to answer any questions my attorneys had,
17 and available to speak and meet with my attorneys whenever they needed me. I responded to them
18 as quickly as possible and gave them as much information and identified as many documents as I
19 could. I spent at least **7 additional hours** speaking with my attorneys about the cases and
20 preparing for contemplated initial disclosures while the cases were pending in the United States
21 District Court for the Central District of California, including and not limited to, identifying
22 potential witnesses (e.g., identifying no less than approximately 7 potential witnesses), providing
23 my attorneys with documents and information concerning the cases, and also describing policies,
24 practices, and procedures of Defendants.

25 20. As far as the settlement is concerned, I was available to ask questions and review
26 documents. I spent about **5 hours** reviewing the original and amended settlement agreements and
27 asking related questions before signing both documents. I have also spent **several additional**
28 **hours** discussing the motion seeking preliminary approval of the settlement agreement and this
declaration with my attorneys.

21. I believe that my efforts helped to achieve the significant settlement outcome that has been reached in this case. I also believe that what I did experience, what I have done, and what I will do in this case, is above and beyond what the expected services are of a class representative. I sincerely and respectfully request that the Court preliminarily approve a service payment to me in the amount of \$22,000.00, and to allow the Class an opportunity to comment on this amount of a service payment and its reasonableness, before the Court decides how much to award me for the service payment at the final approval stage of the Court's settlement review and approval process. Taking into consideration the time that I have dedicated to this matter and the services that I have performed as a contemplated class representative and PAGA representative, as well as my broad general individual release of claims that are very significant for me, which no other Participating Class Member or Aggrieved Employee is providing as part of the settlement, I believe that the contemplated service payment of \$22,000.00 is reasonable.

22. I am not related to anyone associated with Lawyers *for* Justice, PC.

23. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as an enhancement award, as well as my share of the settlement as a Class Member and Aggrieved Employee.

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

Executed on 06/03/2025, at Carson, California.

Electronically Signed 2025-06-03 20:08:42 UTC - 172.56.54.74
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Leopoldo Ariola