

HAINES LAW GROUP, APC

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

RONALD FIGUEROA, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

SOLAR TURBINES INCORPORATED, a
Delaware corporation; and DOES 1 through
100,

Defendants.

Case No. 37-2023-00016512-CU-OE-CTL

*[Case Assigned for all purposes to the Hon.
Gregory W. Pollack, Department C-71]*

**DECLARATION OF RONALD
FIGUEROA IN SUPPORT OF
APPROVAL OF CLASS ACTION
SETTLEMENT**

Action Filed: April 20, 2023
Trial Date: None Set

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I, Ronald Figueroa, declare as follows:

1. I am an individual over the age of 18 and am the named Plaintiff in this matter.

This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Solar Turbines Incorporated (“Solar Turbines”) at its Kearny Mesa, California, location from approximately 2014 to 2015 and later from approximately 2017 to January 2023. I was initially hired as a Welder. My job duties involved inspecting, measuring, and cutting metal parts and then welding the metal parts with a TIG welding torch. During the course of my employment, I do not believe I was properly compensated for all my working time because of Solar Turbines time rounding policy that only paid based on my scheduled shift.

3. In order to complete my job duties, I regularly worked from 4:00 a.m. to 2:30 p.m. or later, however, I was not allowed to take a meal break until around 10:00 a.m. I also did not receive a second meal period when my shifts exceeded 10 hours. There were many times that I had to interrupt, delay, or come back from my meal period early due to work responsibilities. I did not have to clock out for my meal period because Solar Turbines would automatically deduct 30 minutes from my daily time. This was the case whether I was able to take my full meal period or not.

4. During my employment, I also earned extra pay when working certain shifts. When I earned these shift differentials in the same pay period as sick pay, my understanding is that Solar Turbines did not calculate my sick pay wages correctly.

5. Inside the Kearny Mesa facility it would get extremely hot during the summer months. Often the temperatures would reach over 90 degrees due to using the welding torches. There were also numerous occasions when the air conditioners were not working, making the heat almost unbearable.

6. I brought this lawsuit against Solar Turbines because I wanted Solar Turbines to comply with the law and treat its employees fairly. I believe that I have taken on a greater burden

1 than any of the other Solar Turbines employees because I have been actively involved in the
2 litigation, and because it is my name that is attached to the lawsuit. I was willing to attach my
3 name to the lawsuit, even though I understood it would be a public record, because I felt that
4 someone needed to stand up to the company and I was willing to take on that burden for the
5 benefit of my fellow co-workers at Solar Turbines.

6 7. I have been an active participant in this case ever since first consulting with my
7 attorneys in March 2023. In addition to meeting with my attorneys during the initial intake process
8 and providing documents and information needed to initiate the case, I have remained actively
9 involved in facilitating communication between other current and former employees of Solar
10 Turbines and my attorneys. I personally have spent a significant amount of time communicating
11 with other Solar Turbines employees both before and after the mediation. I estimate that I have
12 spent at least 25 or more total hours on activities leading to the resolution of this matter.

13 I declare under penalty of perjury under the laws of the state of California and the United
14 States that the foregoing is true and correct. Executed on November 11/11/2024, in Temecula,
15 California.



Ronald Figueroa (Nov 11, 2024 08:49 PST)

Ronald Figueroa