

Justin F. Marquez (SBN 262417)

justin@wilshirelawfirm.com

Arrash T. Fattahi (SBN 333676)

afattahi@wilshirelawfirm.com

WILSHIRE LAW FIRM

3055 Wilshire Blvd., 12th Floor

Los Angeles, California 90010

Telephone: (213) 381-9988

Facsimile: (213) 381-9989

Heather Davis (SBN 239372)

heather@protectionlawgroup.com

Amir Nayebdadash (SBN 232204)

amir@protectionlawgroup.com

Carlos Jimenez (SBN 227534)

carlos@protectionlawgroup.com

PROTECTION LAW GROUP, LLP

237 California Street

El Segundo, California 90245

Telephone: (424) 290-3095

Facsimile: (866) 264-7880

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

MARIA GRISELDA CASTILLO, individually
and on behalf of all others similarly situated and
as an aggrieved employee and Private Attorney
General,

Plaintiff,

v.

DONALDSON COMPANY, INC. dba
DONALDSON FILTRATION SOLUTIONS, a
Delaware Corporation, and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 23STCV07645

CLASS & REPRESENTATIVE ACTION

*[Assigned for all purposes to: Hon. Elihu M.
Berle, Dept. 6]*

**DECLARATION OF PLAINTIFF MARIA
GRISELDA CASTILLO IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

DECLARATION OF PLAINTIFF MARIA GRISELDA CASTILLO

I, Maria Griselda Castillo, declare as follows:

1. I am an adult resident of the State of California, and, if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am a former employee of Donaldson Company, Inc. ("Defendant"). I worked for Defendant from approximately 1985 to approximately May 2022 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to all of Defendant's policies and practices that have been alleged as unlawful in the First Amended Class Action and Representative Action Complaint and Private Attorneys General Act ("PAGA") Notice sent to Defendant and the Labor & Workforce Development Agency ("LWDA").

4. I initiated this lawsuit because I was concerned that I was not paid properly for all the hours that I worked, was not provided all of my meal and rest breaks and was not paid all my vacation pay.

5. By originating this lawsuit as a class representative, I hoped that I might be able to change Defendant's policies to better protect the working conditions of my co-workers. I also understood that it was my duty as a class representative to represent the best interests of the class, know about the lawsuit, assist my attorneys, and keep updated on the case.

6. I have invested a lot of personal time and energy into this lawsuit. As detailed more fully below, I have spent approximately 45 hours on this case. I made it a priority to be actively involved because I wanted to do everything I can to assist my attorneys in prosecuting this case.

7. Throughout this case, I spent a lot of time on the phone with my attorneys to get updates about the case and provide them with information. For example, during some of the phone

1 calls, my attorneys and I were able to identify instances when I was not paid correctly.
2 Additionally, leading up to the mediation in October 2023, I had multiple lengthy phone calls with
3 Wilshire Law Firm and Protection Law Group, LLP regarding the claims at issue and what was to
4 transpire at the mediation.

5 8. Throughout the case, I also spent time looking for documents relevant to the case to
6 send to my attorneys. I spent numerous hours looking for these documents, including when I first
7 contacted my attorneys, before my attorneys filed the case, and before my case was mediated. I
8 also spent time reviewing legal documents in this case, including the retainers and settlement-
9 related documents (e.g., Memorandum of Understanding, Settlement Agreement, Class Notice,
10 etc.) and discussed, in detail, the terms with my attorneys.

11 9. Additionally, I made myself fully available on the day of mediation and was in
12 continuous contact with my attorneys to assist with any questions or issues that may have arisen.

13 10. I believe the settlement is a good settlement and I would recommend that the Court
14 approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad that I
15 had the opportunity to represent the class in this lawsuit and that I was able to recover money
16 through a settlement for the class.

17 11. I did not make the decision to file a class action lightly. I was concerned by the
18 attention a publicly filed lawsuit, and especially a class action, would attract. My name would be
19 associated with a lawsuit that I filed against my former employer. I am mindful that prospective
20 employers might find out that I sued Defendant. Nevertheless, I felt that important rights were at
21 stake that hurt everyone, and something ought to be done about it.

22 12. I also understand that there was financial risk in bringing this lawsuit. For example,
23 I knew that if I did not prevail in this lawsuit that I could potentially be responsible for Defendant's
24 attorneys' fees and costs.

25 13. I understand that the settlement agreement provides a service payment to me in the
26 amount of \$8,500.00. I believe this amount is fair compensation for my time and effort on this
27 case, for helping to prosecute this case, and the risks with respect to my future employment. In
28 addition, the settlement requires that I enter into a general release, which I understand is broader

1 than the release that will bind other class members. I am receiving no compensation additional to
2 that provided for in the settlement.

3 14. Based on my involvement in this case and the benefits provided to my former co-
4 workers, I can say I helped stand up for the other workers who were too afraid to say anything to
5 management because they did not want to risk losing their jobs or risk the stigma of suing an
6 employer. I was not afraid to take that risk because I strongly care about helping out my former
7 co-workers.

8 15. I reviewed (and ultimately signed) the Joint Stipulation of Class Action and PAGA
9 Settlement in full and my attorneys answered all the questions I had. I believe the settlement terms
10 and allocations are fair, adequate, and reasonable given the strength of the claims and Defendant's
11 defenses.

12 16. I have no conflicts of interest with any class member.

13 17. I have no interest, financial or otherwise, in the proposed third-party administrator,
14 ILYM Group, Inc.

15 18. I am not aware of any other pending matter or action asserting claims that will be
16 extinguished or adversely affected by the Settlement.

17 19. I have given written approval of the fee-splitting agreement between Wilshire Law
18 Firm, PLC, Protection Law Group, LLP, and Oracle Law Firm.

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

21 Executed on 2/9/2024, at Lancaster, California.

22 DocuSigned by:

23 Maria G. Castillo

24 3D38E0D53DC9434...

25 Maria Griselda Castillo

PROOF OF SERVICE

Castillo v. Donaldson Company, Inc., et al.
23STCV07645

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I, Zeyra Ceballos, am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to this action. My business address is 3055 Wilshire Blvd., 12th Fl., Los Angeles, California 90010. My electronic service address is zceballos@wilshirelawfirm.com.

On February 9, 2024, I served the foregoing **DECLARATION OF PLAINTIFF MARIA GRISELDA CASTILLO IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**, on the interested parties by placing a true copy thereof, enclosed in a sealed envelope by following one of the methods of service as follows:

Stacey E. James (SBN 185651)
sjames@littler.com
Mihret Getabicha (SBN 326787)
mgetabicha@littler.com
Ann Posthill
aposthill@littler.com
Rosa Dyer
rdyer@littler.com
LITTLER MENDELSON
501 West Broadway, #900
San Diego, California 92101
Telephone: (619) 232-0441
Facsimile: (619) 232-4302

Attorneys for Defendant

Heather Davis (SBN 239372)
heather@protectionlawgroup.com
Amir Nayebdadash (SBN 232204)
amir@protectionlawgroup.com
Carlos Jimenez (SBN 227534)
carlos@protectionlawgroup.com
PROTECTION LAW GROUP, LLP
237 California Street
El Segundo, California 90245
Telephone: (424) 290-3095
Facsimile: (866) 264-7880

Attorneys for Plaintiff (co-counsel)

(X) **BY UPLOAD:** I hereby certify that the documents were uploaded by my office to the State of California Labor and Workforce Development Agency Online Filing Site.

1 (X) **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to
2 accept electronic service, I caused the documents to be sent to the persons at the electronic
3 service addresses listed above via third-party cloud service **CASEANYWHERE**.

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

5 Executed this **February 9, 2024**, at Los Angeles, California.

6 
7 _____
Zeyra Ceballos