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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

CONRAD MARTINEZ, 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;
CHARLENE RUEDAS, individually, and on
behalf of other members of the general public
similarly situated; WILLIAM YOUAKUM,
individually, and on behalf of other members
of the general public similar situated;

Plaintiffs,

vs.

SOLID SOLUTIONS 24/7, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 34-2020-002286636-CU-OE GDS

Honorable Laurie A. Damrell
Department 22

CLASS ACTION

**DECLARATION OF CONRAD
MARTINEZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Selena Matavosian); Declarations
of Proposed Class Representatives (Charlene
Ruedas and William Youakum); and
[Proposed] Order filed concurrently
herewith]

Date: June 7, 2024
Time: 9:00 a.m.
Department: 22

Complaint Filed: October 6, 2020
FAC Filed: April 6, 2023
Trial Date: None Set

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1 4. Throughout the case, I was available to answer any questions my attorneys had,
2 and available to speak and meet with my attorneys whenever they needed me. I responded to
3 them as quickly as possible and gave them as much information and identified as many
4 documents as I could. I spent at least **20 additional hours** speaking with my attorneys about the
5 case, identifying potential witnesses, providing my attorneys with documents and information
6 concerning the case, and also describing policies, practices, and procedures of Solid Solutions.

7 5. As far as the settlement is concerned, I was available to review documents and
8 answer any questions my attorneys had. I spent about **4 hours** reviewing the settlement
9 agreement and about **4 hours** asking questions and discussing the potential settlement with my
10 attorneys before signing the settlement agreement.

11 6. I believe that I have done everything that my attorneys have asked of me and have
12 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
13 and the State of California. I think my efforts helped to get the result obtained in this case, and as
14 a class and PAGA representative, I respectfully request that the Court award me an enhancement
15 payment in the amount of \$10,000.00 for my active participation in this case. Taking into
16 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

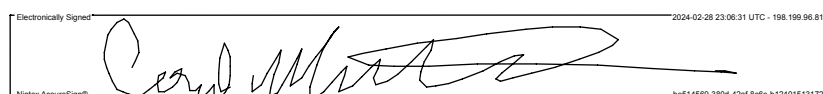
17 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

18 8. I have not entered into any undisclosed agreements, nor have I received any
19 undisclosed compensation in this case. The only compensation I will receive is whatever amount
20 the Court awards as an enhancement payment, as well as my share of the settlement as a class
21 member and as an aggrieved employee.

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

24 2/28/2024

25 Executed this ____ day of February 2024, at Vacaville, California

26 The image shows an electronic signature of Conrad Martinez. The signature is written in black ink over a white background. Above the signature, the text "Electronically Signed" is visible. To the right of the signature, the date and time "2024-02-28 23:06:31 UTC - 198.199.96.81" are displayed. Below the signature, the text "Nintex AssureSign®" is visible, followed by a long alphanumeric string "b0514569-380d-42af-8cde-b12401513172".

27 Conrad Martinez