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Attorneys for Plaintiffs, on a representative basis
and on behalf of all others similarly situated

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

VICTOR MEDINA and FRANCISCO
CRUZ, individually, on a representative
basis, and on behalf of all others similarly
situated;

Plaintiff,

vs.

HOWARD ROOFING COMPANY, INC.,
a California Corporation; and DOES 1
through 20, inclusive;

Defendants.

Case No.: CIVSB2312233
*[Assigned to Hon. Jessica Morgan, Dept S26, for
all purposes]*

**DECLARATION OF FRANCISCO CRUZ
IN SUPPORT OF PLAINTIFFS'
UNOPPOSED MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing

Date: November 4, 2024

Time: 8:30 a.m.

Dept.: S26

1 working conditions including their practices and procedures. I also searched for and gathered
2 information and documents related to the case. I conferred with my attorneys on numerous
3 occasions to provide insight and perspective on this case as well as obtain updates regarding the
4 action and to answer questions. I also conferred with and identified class members who were
5 willing to testify for purposes of class certification. Further, I conferred with my attorneys
6 regarding questions to be asked to Defendant for documents and information related to this case.

7 7. To prepare for mediation, I discussed the case in detail with my attorneys,
8 including its potential strengths and weaknesses. I believe that my thorough knowledge of
9 Defendant's practices assisted them in evaluating the claims and assessing the potential damages
10 for use at mediation. I think that my efforts helped obtain the results in this case. I understand that
11 I may be entitled to an additional payment for acting as the Class Representative, and that this
12 payment is subject to Court approval. Considering the time I devoted to this case and the results
13 achieved through the settlement, I believe that the requested award is reasonable. My opinion
14 about the fairness and adequacy of the settlement is not based on this potential award..

15 8. I estimate that I spent about 50-60 hours obtaining and providing documents,
16 information, and information for class members; reviewing and analyzing documents, pleadings,
17 and the settlement agreement; conferring with my attorneys; answering questions, and conferring
18 with class members, among other things.

19 9. I received no benefit from my attorneys, Defendant, or anyone else as a result of
20 prosecuting this action.

21 10. I have reviewed the Class Action and PAGA Settlement Agreement and Release
22 of Claims, discussed the terms with my attorney, and asked my attorney any questions I had. I
23 believe the terms of the Settlement and allocations are fair and reasonable given the facts of the
24 case.

25 I declare under penalty of perjury under the laws of the State of California that the
26 foregoing is true and correct. Executed on 10/02/2024 in South Gate, California.

27
28 
Francisco Cruz (Oct 2, 2024 15:31 PDT)

Francisco Cruz