

DIVERSITY LAW GROUP, P.C.  
Larry W. Lee (State Bar No. 228175)  
[lwlee@diversitylaw.com](mailto:lwlee@diversitylaw.com)  
Simon L. Yang (State Bar No. 260286)  
[sly@diversitylaw.com](mailto:sly@diversitylaw.com)  
515 South Figueroa Street, Suite 1250  
Los Angeles, California 90071  
Telephone: (213) 488-6555  
Facsimile: (213) 488-6554

POLARIS LAW GROUP  
William L. Marder (State Bar No. 170131)  
[bill@polarislawgroup.com](mailto:bill@polarislawgroup.com)  
501 San Benito Street, Suite 200  
Hollister, California 95023  
Telephone: (831) 531-4214  
Facsimile: (831) 634-0333

Attorneys for Plaintiff

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

PAUL ESPARZA, as an individual and on behalf  
of all others similarly situated, and as a private  
attorney general,

Plaintiff,

vs.

SCIENTIFIC DRILLING INTERNATIONAL,  
INC., a Texas corporation; and DOES 1 through  
50, inclusive,

Defendants.

Case No. BCV-23-101895

[Hon. Mark T. Smith, Department T2]

**DECLARATION OF PAUL ESPARZA IN  
SUPPORT OF PLAINTIFF’S MOTION FOR  
APPROVAL OF PAGA SETTLEMENT**

Date: January 15, 2025  
Time: 8:30 a.m.  
Courtroom: T2

Complaint Filed: June 16, 2023  
FAC Filed: August 11, 2023

1 I, Paul Esparza, declare as follows:

2 1. I am an individual over the age of 18. I am the named plaintiff in the above-reference  
3 action. I have personal knowledge of the facts set forth below, except as to those matters stated on  
4 information and belief and, as to those matters, I believe them to be true. If called as a witness, I could  
5 testify competently as to the matters stated in this declaration.

6 2. In September of 2022, I began working for Scientific Drilling International, Inc. as an  
7 MWD Operator. Until my employment ended in December of 2022, I was paid on an hourly basis as a  
8 non-exempt employee and earned non-base hourly wages or other non-hourly, non-discretionary  
9 remuneration, including for example incentives and stipends. When I worked 3.5 hours in a workday, I  
10 regularly was not provided lawful rest periods. Likewise, when I worked more than 5.0 hours in a  
11 workday, I regularly was not provided lawful meal periods. I also was regularly not provided an  
12 additional hour of regular rate wages for a missed, late, or interrupted meal period or rest period but  
13 instead paid an additional hour of wages at my base hourly rate of pay. Nor was I paid all overtime at  
14 one and one-half times the regular rate. I am informed and believe that I was not timely paid all due  
15 wages during employment or upon separation of employment and also was not provided with accurate  
16 itemized wage statements.

17 3. I understand that this action is being prosecuted on behalf of the State of California and  
18 that I am acting as a private attorney general. I have taken all necessary steps to represent the interests of  
19 the State, including by providing information and documents to my counsel, discussing the claims and  
20 lawsuit with my counsel, and answering any questions that have come up, including about how I was  
21 paid or what my wage statements show or meant. I made myself available to participate in the discovery  
22 process as well as in a mediation.

23 4. I understand that I am responsible to the State with respect to trying the case, appearing  
24 in court, and working with my counsel. I remain willing to devote my time to this lawsuit for the benefit  
25 of the State. I do not believe I have any interests that are adverse to the interests of the State. I also am  
26 unaware of any such issues having been raised or presented by anyone else.

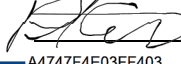
27 5. I believe many employees would not sue their employer out of fear. I took on risks by  
28 bringing this lawsuit, and I understand that the State and others will benefit because of the actions that I

1 have taken. I feel that it is a positive accomplishment, am proud of the result, and believe that the  
2 settlement is fair, adequate, and reasonable.

3 6. I am informed and believe that there are other individual claims that I could have pursued  
4 in litigation. Nonetheless, I am executing a general release of any and all claims, including a waiver of  
5 any rights I have under Civil Code section 1542. I understand the proposed settlement does not require  
6 similar releases of any other employees.

7 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
8 true and correct. Executed this 13<sup>th</sup> day of December 2024, at Santa Clarita, California.

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Signed by:  
  
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Paul Esparza