Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Yasmin Hosseini (SBN 326399)
Helene Mayer (SBN 332975)
LAWYERS *for* JUSTICE, PC
450 North Brand Boulevard, Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs Alfonso Morales and Aliyah Williams

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

ALFONSO MORALES, ALIYAH WILLIAMS, individually, and on behalf of other members of the general public similarly situated;

Plaintiffs,

vs.

CP KELCO U.S. INC., a Delaware corporation; J.M. HUBER MICROPOWDERS, INC., a California corporation; J.M. HUBER CORPORATION, a Georgia corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 37-2023-00042644-CU-OE-CTL

Honorable Matthew C. Braner
Department C-60

CLASS ACTION

DECLARATION OF ALFONSO MORALES IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Hearing Date:	October 30, 2026
Hearing Time:	9:00 a.m.
Department:	C-60
Complaint Filed:	October 2, 2023
FAC Filed:	September 9, 2024
SAC Filed:	October 29, 2024
Trial Date:	None Set

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DECLARATION OF ALFONSO MORALES

I, Alfonso Morales, hereby declare as follows:

1. I am over 18 years of age and a resident of Texas. I am one of the named plaintiffs in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by CP Kelco, U.S. Inc. ("Defendant") from approximately October 2021, until January 2023, as a non-exempt employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. Throughout this matter, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent time speaking with my attorneys about the case, identifying potential witnesses,

providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendant.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the Settlement Agreement and discussed the questions I had regarding the potential settlement with my attorneys before signing the settlement papers.

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

7. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as an enhancement award, my share of the settlement as a class member and/or aggrieved employee, and payment from Defendant in connection with a contemplated separate confidential individual settlement and general release agreement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. 09/24/2026

Executed on this ___day of _____ 2026, at Arcola, Texas.



Alfonso Morales

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450 North Brand Boulevard, Suite 900
Glendale, California 91203