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

ARMANDO GASTELUM, individually, and
on behalf of other members of the general
public similarly situated,

Plaintiffs,

vs.

PREMIER TRAILER MANUFACTURING,
INC., a California corporation; and DOES 1
through 25, inclusive,

Defendants.

Case No.: VCU300333

Honorable Bret D. Hillman
Department 2

**DECLARATION OF PLAINTIFF
ARMANDO GASTELUM IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: April 15, 2025
Time: 8:30 a.m.
Dept: 2

Complaint Filed: July 27, 2023
FAC Filed: September 27, 2023
Trial Date: Not Set

1 6. I understood that in the event this matter did not settle and proceeded with trial, I would
2 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
3 responsibilities that are necessary for this lawsuit.

4 7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
5 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
6 also understood there was a risk of losing any job and/or income due to the time that I would have to
7 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. Most
8 importantly, I believe that by pursuing this case, I have taken a significant risk because future
9 employers can easily find out that I sued my prior employer, and that may negatively impact my ability
10 to find employment within this industry – and even outside of it – in the future. In contrast, the other
11 employees who will be receiving money from this lawsuit did not have to file a claim or take the risk
12 that I took in bringing this action.

13 8. I reviewed the settlement agreement, discussed the settlement agreement with my
14 attorneys, and asked them questions before signing it.

15 9. I believe that I have done everything that my attorneys have asked of me and tried, to
16 the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California.
17 I have spent numerous hours participating in this case as described above. I believe my efforts helped
18 get the result obtained in this case.

19 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
20 approval, and any settlement must be designed in the best interest of the Class as a whole. At all times
21 throughout the course of this litigation I have considered the interests of the Class and put them before
22 my own personal interests.

23 11. I understand that incentive or enhancement awards are discretionary and intended to
24 compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and
25 other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA
26 action, and an acknowledgment of the benefits resulting from the representative's actions. I believe
27 my work in this matter is meritorious on these points for the reasons set forth above.

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12. I respectfully request that the Court approve and award me an Enhancement Payment in the amount of \$5,000.00 for my efforts and active participation in the case and for the broader, general release of all claims that I have or may have against Premier in connection with the settlement. Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

13. I am not related to anyone associated with Blackstone Law, APC.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 03/18/2025, at Visalia, California.

Q. E. F. J.

Armando Gastelum