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9 on behalf of the State of California,
10 and others similarly situated and aggrieved

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Attorneys for Plaintiffs CHARLES
KEOPIMPHA and NHAT NGUYEN
on behalf of the State of California,
and others similarly situated and aggrieved

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **COUNTY OF LOS ANGELES**

13 JUAN PADILLA, CHARLES
14 KEOPIMPHA, and NHAT NGUYEN,
15 individually and on behalf of the State of
California, and others similarly situated and
aggrieved,

16 Plaintiffs,

17 v.

18
19 SPACE EXPLORATION
20 TECHNOLOGIES CORP., a Texas
Corporation; and DOES 1-100, inclusive,

21 Defendants.

Case No.: 23STCV17559

**DECLARATION OF CHARLES
KEOPIMPHA IN SUPPORT OF
MOTION FOR APPROVAL OF PAGA
SETTLEMENT**

DECLARATION OF NHAT NGUYEN

I, NHAT NGUYEN, hereby declare as follows:

1. I am over the age of 18. I am one of the Plaintiffs in the above-captioned lawsuit. I have personal knowledge of the facts set forth in this declaration. If called as a witness, I could and would testify competently to them. I make this declaration in support of Plaintiffs' motion for court approval of a settlement under the California Private Attorneys General Act.

2. I worked for SpaceX as a Structures Technician from March 13, 2023 through August 4, 2023. I was primarily tasked with helping to build a heat-resistant, cone-shaped structure to be affixed to the top of rockets. I usually worked ten hour days Monday through Friday, but frequently worked beyond ten hours and sometimes had to come in on Saturdays as well. My base hourly rate was \$27, and I earned premium pay of \$2.29 per hour for working night shift.

3. While I worked there I don't think received all of the meal breaks I was entitled to, especially on those longer shifts of 10+ or 12+ hours where I usually didn't get a second meal period. Likewise I didn't get a third rest break on those long shifts either. I also was paid for sick pay and vacation pay at my base hourly rate, which didn't account for other pay I received like the shift differentials for working the night shift.

4. I decided to file this lawsuit because I did not feel that I was treated fairly as an employee of Defendant with regard to not being paid correctly, not getting all of my lunches and breaks like I was supposed to, and not receiving all of my pay at the correct rate.

5. It is my understanding this lawsuit could not have been prosecuted or settled on behalf of the other employees unless I or some other current or former employee decided to serve as a named plaintiff and proposed PAGA representative. In deciding to serve as a named plaintiff in this case, I understood that my name could be publicly attached to this lawsuit and that my work experiences to some extent would be set forth in a public court file. I recognized I would need to devote a certain amount of time that I could have spent otherwise. I also recognized my bringing the lawsuit carried some degree of risk for defendants' legal costs among other things.

1 Despite this, I decided to serve as the named plaintiff and PAGA rep without any promise of
2 recovery or compensation.

3 6. I am familiar with the work involved in prosecuting this case. I have participated
4 in meetings, phone calls, and other communications with my lawyers regarding this case. I am
5 familiar with the allegations and defenses of the claims in this case. I am familiar with the major
6 events in this case, including the investigation performed by my lawyers, the mediation with
7 Defendants that eventually resulted in this settlement, and the preparation of settlement papers
8 and the need to obtain court approval of the proposed settlement. I participated in the litigation
9 and provided my lawyers with information and documents regarding my employment with
10 Defendant.

11 7. I believe that the proposed settlement obtained on behalf of the State and other
12 aggrieved employees is excellent in view of the issues and risks involved with the case.

13 I declare under penalty of perjury under the laws of California that the foregoing is true
14 and correct. Executed on 08/25/2025, at Santa ana, California.

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18 CHARLES KEOPIMPHA
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