

Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Vartan Madoyan (SBN 279015)
Helene Mayer (SBN 332975)
LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs and the Settlement Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

MARCELL NEWHOUSE, individually, and
on behalf of other members of the general
public similarly situated; and ABIGAIL
CRISTOBAL, on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act,

Plaintiff,

v.

OWENS CORNING INSULATING
SYSTEMS, LLC, a Delaware limited liability
company; OWENS CORNING SALES, LLC,
a Delaware limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 22CV397048

Honorable Theodore C. Zayner
Department 19

CLASS ACTION

**DECLARATION OF ABIGAIL
CRISTOBAL IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEYS' FEES
AND COSTS, AND CLASS
REPRESENTATIVE ENHANCEMENT
PAYMENTS**

Date: October 1, 2025
Time: 1:30 p.m.
Department: 19

Complaint Filed: April 9, 2022
FAC Filed: June 11, 2024
Trial Date: None Set

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I, **ABIGAIL CRISTOBAL**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. 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 Defendants Owens Corning Insulating Systems, LLC and Owens Corning Sales, LLC (“Defendants”) as an hourly-paid, non-exempt “handy person” from approximately January 2017 to approximately October 2022. I decided to seek legal advice about my work experience with Defendants. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were held accountable for not properly compensating aggrieved employees for all hours worked and non-compliant meal and rest breaks. I consulted with the attorneys at Lawyers *for* Justice, PC for almost **4 hours** discussing my situation and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff and a PAGA representative.

3. I have spent over **5 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which has included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of other hourly-paid employees, and helping develop a strategy as to what documents and information to obtain from Defendants. 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. 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 at least **4 additional hours** speaking with my attorneys about the case, identifying

1 potential witnesses, providing my attorneys with documents and information concerning the
2 case, and also describing policies, practices, and procedures of Defendants.

3 5. As far as the settlement is concerned, I spent about **2 hours** reviewing the
4 settlement agreement and about **1 hour** asking questions and discussing the potential settlement
5 with my attorneys before signing the settlement agreement.

6 6. I believe that I have done everything that my attorneys have asked of me and have
7 tried, to the best of my ability, to seek relief for the aggrieved employees and the State of
8 California. I think my efforts helped to get the result obtained in this case, and as a PAGA
9 representative, I respectfully request that the Court award me an enhancement payment in the
10 amount of \$5,000.00 for my active participation in this case. Taking into consideration the time
11 that I have dedicated to this case, I believe that this amount is reasonable.

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

13 8. I have not entered into any undisclosed agreements, nor have I received any
14 undisclosed compensation in this case. The only compensation I will receive is whatever amount
15 the Court awards as an enhancement payment, as well as my share of the settlement as a class
16 member and as an aggrieved employee.

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct.

19 Executed on this day 08/30/2024, at Santa Clara, California.

20  2024-08-30 20:19:21 UTC - 107.3.155.240
Nintex AssureSign® 6209501f-4351-4641-a090-b1d031463294

21 Abigail Cristobal