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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN**

GABRIEL TROCHE MALDONADO,
GREGORY A. SHERMAN, individually, and on
behalf of other aggrieved employees pursuant to
the California Private Attorneys General Act;

Plaintiff,

vs.

AMERIGAS PROPANE, INC., a California
limited liability company; and DOES 1 through
100, inclusive,

Defendants.

Case No.: STK-CV-UOE-2023-0010754

Honorable Barbara Kronlund
Department 10D

**DECLARATION OF GABRIEL TROCHE
MALDONADO IN SUPPORT OF PLAINTIFFS'
MOTION FOR APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL. LABOR
CODE § 2698, ET SEQ.) SETTLEMENT
AGREEMENT AND AWARD OF PAGA
COUNSEL FEES PAYMENT, GENERAL
RELEASE FEE PAYMENTS, AND
ADMINISTRATION EXPENSES PAYMENT**

Date: 9:00 a.m.

Time: 10D

Department:

October 10, 2023

Complaint Filed: June 14, 2024

FAC Filed: February 2, 2026

Trial Date

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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.

3. I have spent many hours communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, providing information regarding the duties of aggrieved 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.

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2 5. As far as the settlement is concerned, I was available to review documents and answer
3 any questions my attorneys had. I spent several hours reviewing the settlement agreement and asking
4 questions and discussing the potential settlement with my attorneys before signing the settlement
5 agreement.

6 6. I believe that I have done everything that my attorneys have asked of me and that is
7 expected of a PAGA representative, and that I have tried, to the best of my ability, to seek relief for the
8 aggrieved employees and the State of California. I think my efforts helped to get the result obtained in
9 this case.

10 7. For my broader individual waiver and general release of claims with a California Civil
11 Code Section 1542 waiver (set forth in Paragraphs 3.2.1 and 5.1 of the Stipulation of Settlement of
12 Representative Claims Under the Labor Code Private Attorneys General Act and also memorialized in
13 a separate confidential individual release agreement) and agreement not to disparage Defendant or any
14 of the Released Parties (memorialized in a separate confidential individual release agreement), the
15 Settlement provides for a General Release Fee to be paid to me in the amount of \$7,500.00, out of the
16 Gross Settlement Amount, subject to Court approval. I respectfully request that the Court award me full
17 payment of the General Release Fee.

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

19 9. I have not received any undisclosed compensation in this case. The only compensation I
20 will receive is the General Release Fee, as well as my share of the settlement as an aggrieved employee,
21 subject to Court approval.

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

24
25 Executed this 8th day of July 2025, at Lodi, California.

26
27 An electronic signature box containing a handwritten signature in black ink. The box has a thin black border. Above the signature, the text "Electronically Signed" is on the left and "2025-07-09 03:12:40 UTC - 104.28.103.126" is on the right. Below the signature, the text "Nitex AssureSign" is on the left and "596f707a-5d22-4fae-86da-b314011e5766" is on the right.

28 Gabriel Troche Maldonado