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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

BRIAN ESTEVEZ, LUIS AGUILAR,
individually, and on behalf of other members
of the general public similarly situated and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiffs,

vs.

ULTIMATE REMOVAL, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Lead Case No.: 23STCV30090
[Consolidated with Case No. 23PSCV03670]

Honorable Elaine Lu
Department 9

CLASS ACTION

**DECLARATION OF BRIAN ESTEVEZ
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: January 15, 2026
Time: 10:00 a.m.
Department: 9

Complaint Filed: December 8, 2023
FAC Filed: July 17, 2025
Trial Date: None Set

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DECLARATION OF BRIAN ESTEVEZ

I, **Brian Estevez**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am a named plaintiff in the above-captioned action *Estevez v. Ultimate Removal, Inc.*, Superior Court of California for the County of Los Angeles, Case No. 23STCV30090, and the consolidated action *Estevez v. Ultimate Removal, Inc.*, Superior Court of California for the County of Los Angeles, Case No. 23PSCV03670. 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 Defendant Ultimate Removal, Inc. (“Ultimate Removal”) as an hourly-paid Laborer from approximately May 2021 to approximately July 2021. I decided to seek legal advice about my work experiences with Ultimate Removal 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 Ultimate Removal was held accountable for its practice of 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 pendency of 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 Ultimate Removal, reviewing documents with my attorneys, answering their questions, providing guidance regarding the duties of hourly and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Ultimate Removal. I

1 frequently checked in with my attorneys and their staff to make sure that they had all my most
2 current information and any additional information that I had obtained.

3 4. As the case progressed, I was available to answer any questions my attorneys had
4 and remained available to speak and meet with my attorneys whenever they needed me. I
5 responded to them as quickly as possible and gave them as much information and identified as
6 many documents as I could. I spent time speaking with my attorneys about the case, identifying
7 potential witnesses, providing my attorneys with documents and information concerning the
8 case, and also describing policies, practices, and procedures of Ultimate Removal.

9 5. As far as the settlement is concerned, I was available to review documents and
10 answer any questions my attorneys had. I reviewed the settlement agreement, asked questions,
11 and discussed the potential settlement with my attorneys before signing the settlement
12 agreement.

13 6. I believe that I have done everything that my attorneys have asked of me and have
14 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
15 obtained in this case, and as a class representative and PAGA representative, I respectfully
16 request that the Court award me an enhancement award in the amount of \$7,500.00 for my active
17 participation in this case. Taking into consideration the time that I have dedicated to this case, I
18 believe that this amount is reasonable.

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

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

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

08/30/2025

26 Executed this ____ day of August 2025, at Los Angeles, California.

27 Electronically Signed  2025-08-30 23:32:47 UTC - 146.75.146.171*
Hintex AssureSign® 79de9028-aa2a-43ea-9115-b3480144e0ec...

28 Brian Estevez

DECLARATION OF BRIAN ESTEVEZ