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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **FOR THE COUNTY OF LOS ANGELES – STANLEY MOSK COURTHOUSE**

10 STEVE PAURA, on behalf of the State of
California, and others similarly situated and
11 aggrieved,

12 Plaintiff,

13 v.

14 CENTINELA FEED, INC.; and DOES 1-100,
15 inclusive,

16 Defendants.

Case No.: 23STCV28435

Assigned for all purposes to Hon.
Christopher Lui Dept. 76

DECLARATION OF STEVE PAURA

Date: May 27, 2025

Time: 8:30 AM

Dept.: 76

Reservation ID:612307738243

1 I, Steve Paura, declare as follows:

2 1. I am an adult over the age of eighteen (18) years old. I am a plaintiff in the above-
3 captioned lawsuit. I have personal knowledge of the facts set forth in this declaration. I make this
4 declaration in support of Plaintiff's Motion for Approval of Settlement under the Private Attorneys
5 General Act.

6 2. I worked for Defendant from about October 2021 until June 2023, at the company's
7 warehouse in Torrance, California. While I worked there I don't think I was paid for all hours that I
8 worked because I frequently spend several minutes waiting to go through a bag check when leaving
9 at the end of my shift, as after clocking out I had to wait for a supervisor to arrive at the facility exit
10 for the bag check. Since this happened after I clocked out I was not paid for the time even though
11 the company's policy required that I wait there. I also don't think I received all of the meal and rest
12 breaks I was entitled to, as lunches and breaks would not be taken or would be either start late in a
13 shift or last less than 30 minutes. I also had to use my own phone for company business such as
14 receiving phone calls and texts from managers and supervisors, and I never got any reimbursement.

15 3. I decided to file this lawsuit because I did not feel that I was treated fairly as an
16 employee of Defendant, especially with regard to me not being paid for the bag checks, for not
17 getting all of my lunches and other breaks, and not getting full reimbursement for using my own
18 phone.

19 4. It is my understanding this lawsuit could not have been prosecuted or settled on
20 behalf of the other employees unless I or some other current or former employee decided to serve as
21 a named plaintiff. In deciding to serve as a named plaintiff in this case, I understood that my name
22 could be publicly attached to this lawsuit and that my work experiences to some extent would be set
23 forth in a public court file. I recognized I would need to devote a certain amount of time that I could
24 have spent otherwise. I also recognized my bringing the lawsuit carried some degree of risk for
25 defendants' legal costs among other things. Despite this, I decided to serve as the named plaintiff
26 without any promise of recovery or compensation.

27 5. I am familiar with the work involved in prosecuting this case. I have participated in
28 meetings, phone calls, and other communications with my lawyers regarding this case. I am familiar

1 with the allegations and defenses of the claims in this case. I am familiar with the major events in
2 this case, including the investigation performed by my lawyers, the mediation with Defendant that
3 resulted in this settlement, and the preparation of settlement papers and the need to obtain court
4 approval of the proposed settlement. I participated in the litigation and provided my lawyers with
5 information and documents regarding my employment with Defendant.

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

8 7. I believe I have fulfilled my duties as a named plaintiff in the case, which required a
9 significant amount of time and effort during the course of this case. These efforts required
10 dedicating numerous hours to lawsuit activities including, but not limited to: (a) communicating
11 with my attorneys to stay informed of ongoing developments in the case and to discuss the proposed
12 settlement ultimately negotiated; (b) searching for and providing documents and other materials
13 relating to my work experience; (c) responding to requests for information relating to my work
14 experience; and (d) reviewing filings and key documents including drafts of the complaint and the
15 settlement agreement. These tasks required my dedication of at least 15-20 hours of my time, which
16 time I honestly could have spent on family, personal time, or work. My understanding is that future
17 tasks may require several more hours of my time. Further, at all times I was ready, willing and able
18 to testify at deposition and/or trial. I believe I have been diligent and that I have acted above and
19 beyond that of which is expected of a named plaintiff and proposed class representative to date and
20 will continue to do so. To the best of my knowledge I have not conflicts of interest of any kind with
21 any other class member.

22 8. It is my opinion that \$10,000.00 is a fair and adequate award for my service as the
23 named plaintiff and PAGA representative, and in consideration for my general release of all claims
24 against Defendant. I believe that amount is fair and reasonable in view of the work I have and will
25 continue to perform on behalf of the other employees. I believe that my role as the main plaintiff in
26 this lawsuit has resulted in a valuable benefit to the State and other aggrieved employees, and I
27 accepted the potential risk of being liable for the opposing parties' costs if we were unsuccessful in
28 this lawsuit. I believed in this case, so I was willing to be the named plaintiff to risk this and pursue

1 this litigation. I also accepted the risk that news of this lawsuit could also potentially impact my
2 ability to secure other work.

3 9. Based on the time, service, risk, stress, potential stigma, loss of benefits and
4 excellent outcome of this case, I believe the enhancement for me is fair and reasonable.

5 I declare under penalty of perjury under the laws of California that the foregoing is true and
6 correct. Executed on 01 / 22 / 2025, at Carson, California.

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9 _____
Steve Paura