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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SANTA CLARA

CRUZ M. JUAREZ and JOSEPH
GONZALES, individuals, on behalf of
Plaintiffs, and on behalf of all persons similarly
situated,

Plaintiffs,

v.

CENTURY COMMERCIAL SERVICE dba
CENTURY LIGHTING & ELECTRIC, a
California corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. 25CV461988

**DECLARATION OF CRUZ M. JUAREZ IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: July 30, 2026

Time: 2:30 p.m.

Judge: Hon. Beth McGowen

Dept.: 22

1 I, CRUZ M. JUAREZ, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am one of the named Plaintiffs in the
4 above wage and hour action filed against Century Commercial Service *dba* Century Lighting & Electric
5 (“Defendant”).

6 2. This declaration is being submitted in support of Plaintiffs’ Motion for Preliminary
7 Approval of Class Action and PAGA Settlement.

8 3. I believe that I am, have been, and will continue to represent the interests of the class
9 fairly and adequately. I have claims that are typical of the claims of the Class Members and Aggrieved
10 Employees that I am seeking to represent.

11 4. I worked for Defendant as a non-exempt employee in California from December of 2021
12 to September of 2024. At all times during my employment, I earned an hourly wage and was entitled to
13 legally compliant meal and rest periods, and minimum, regular and overtime wages for all hours
14 worked. Throughout my employment, I was subject to Defendant’s policies and procedures.

15 5. Generally, my lawsuit claims that Defendant failed to pay for all time worked, failed to
16 provide complaint meal and rest periods, failed to reimburse for required business expenses, failed to
17 correctly calculate the regular rate of pay, failed to furnish accurate itemized wage statements, and failed
18 to pay all wages when due.

19 6. I believe that my claims are typical of the claims of the Class Members and Aggrieved
20 Employees that I am seeking to represent because I was subject to the same alleged unlawful
21 employment policies and practices at issue in this action, including but not limited to, Defendant’s
22 failure to pay for all hours worked, failure to correctly calculate the regular rate of pay, failure to provide
23 complaint meal and rest periods, failure to reimburse for mandatory business expenses, failure to furnish
24 accurate itemized wage statements, failure to pay for all hours worked, and failure to pay all wages
25 when due. Factually, Defendant’s policies and practices apply class wide, and Defendant’s liability can
26 be determined by facts common to all members of the Class.

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1 7. Further, there is no conflict between my interests and the interests of the class that I am
2 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that
3 I was injured by the same company-wide policies and practices to which the proposed Class was
4 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
5 of the Class by initiating this litigation, and evaluating the proposed settlement to assure that it is fair.

6 8. I understood at the time that I filed this action, that as a Class Representative, I owed a
7 duty to the putative class members to faithfully prosecute this action with their best interests at the
8 forefront of every decision. I understood that I could not make any decision in this action for the sole
9 benefit of my personal interest. I understood that in executing this duty, I might have been asked to
10 sacrifice my personal best interests for the benefit of the interests of the putative class members.
11 Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible
12 relief for my former co-workers for what I perceived to be Defendant's unlawful wage and hour
13 practices. I believe that I faithfully executed the duties of a Class Representative throughout this
14 litigation and will continue to do until this litigation is fully and finally resolved.

15 9. I have reviewed the terms of the Agreement in its entirety, including the monetary terms
16 and releases. I believe that the proposed settlement before the Court is fair, reasonable, and adequate,
17 and made in the best interest of the Class Members. Consequently, I respectfully, and humbly, ask the
18 Court to grant preliminary approval of the Settlement and all of its terms.

19
20 I declare under the penalty of perjury under the laws of the State of California that the foregoing
21 is true and correct. Executed 06/30/2026 (date), at Santa Clara (city), California.

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23 By:  Cruz M. Juarez (Jun 30, 2026 19:34:43 PDT)
24 CRUZ M. JUAREZ
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