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JOSE RODRIGUEZ and the Proposed Class
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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CATHERINE ANDERSON, as an
individual and on behalf of all others
similarly situated; JOSE RODRIGUEZ,
as an individual on behalf of himself
and all other similarly situated,

Plaintiffs,

vs.

KINDER MORGAN, INC., a Delaware
corporation; and DOES 1 through 100,
inclusive,

Defendants.

CASE NO. 23STCV25789

Assigned to the Hon. Laura A. Seigle, Dept.
SSC-17

**DECLARATION OF PLAINTIFF JOSE
RODRIGUEZ IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT & PAGA
SETTLEMENT**

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DECLARATION OF JOSE RODRIGUEZ

I, Jose Rodriguez, declare as follows:

1. I am over 18 years old and a resident of the United States. I have personal knowledge of the matters set forth herein, and if called upon to testify, I could and would do so competently. I make this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and PAGA Settlement.

2. I am one of the named Plaintiffs and class representatives in the above-captioned action (the "Action"). In this declaration I set forth a summary of my efforts and participation in the Action, my common experience with the other class members, and my understanding of my responsibilities and duties as a class representative for the other class members.

3. Starting in approximately January of 2022 through July 26, 2023, I worked for Kinder Morgan, Inc. ("Defendant"), in California, in the position of Operator 12. I was paid on an hourly basis.

4. In late July of 2023, I reached out to the Azadian Law Group, PC, to address my concerns related to my prior employment.

5. I researched the Azadian Law Group, PC, and saw they had a lot of experience in employment law and gave them a call. After an initial call, I spoke with attorney George Azadian, who asked me numerous questions about my background, my employment history, and my work for Defendant. He also asked me for, and I provided numerous documents, including my wage statements and any records I could find related to my employment.

6. I reviewed and signed a representation agreement with Azadian Law Group, PC.

7. It was a difficult decision to move forward as a named plaintiff in this Action because I feared that a lawsuit would be a stain on my record and ability to continue to earn a living in the future. I believe employers generally do not favor individuals who file lawsuits against their employers. However, I decided that being the

1 named plaintiff in this Action was the right thing to do in order to make sure that other
2 employees and former employees were able to get some recovery for what I believe were
3 unfair issues with pay.

4 8. Once a draft was prepared, I reviewed the legal Complaint that was to be
5 filed and had discussions with Mr. Azadian about its contents.

6 9. After the case was filed, I had multiple calls with my lawyer (Mr. Azadian)
7 who provided updates on a regular basis (usually once a month or more).

8 10. At my lawyer's request, I participated in two early-neutral-evaluation
9 conferences with the Court. This was a stressful process because I had not been involved
10 in these types of legal proceedings prior to this case.

11 11. At my lawyer's request, I was also available during the mediation with
12 Defendant. Prior to the mediation, I also discussed the mediation process with Mr.
13 Azadian.

14 12. Once the key terms of the settlement were reached, I reviewed and signed a
15 Memorandum of Understanding with the key terms of the settlement. I approved the key
16 terms of the settlement and was happy with the amount of the settlement for the class
17 members.

18 13. Once the long-form settlement agreement was ready, it was sent to me. I
19 read the agreement, and I discussed its terms with my lawyer to make sure it was a fair
20 settlement prior to signing the agreement. Because the agreement was very long, this
21 took me over an hour to complete to make sure I knew what I was signing, including a
22 release of any and all claims I had against Defendant.

23 14. In total, I estimate that I spent over 30 hours working on this case.

24 15. I understand that as a class representative I have an important duty to look
25 out for the best interests of the class. I understood from the start of considering this case
26 based on my discussions with my lawyer that I would have to take on significant
27 responsibilities and burdens for the benefit of the class, which could include having my
28

1 deposition taken to give testimony under oath, that I could face the possibility of
2 subpoenas being issued to former and current employers, and that I may testify in Court
3 for the benefit of not only myself but the other members of the class.

4 16. I have taken my responsibility as a class representative seriously and will
5 continue to do so. I have learned about the laws relating to payment of wages,
6 requirements for meal and rest periods, and the other issues in this Action.

7 17. I know of no conflicts between my interests and goals and the interests and
8 goals of anyone else in the class.

9 18. I also have no interest in or relationship with the administrator Phoenix
10 Settlement Administrators, who is proposed as the administrator of the settlement (to
11 send notice to the class, send out the checks, and other tasks).

12 19. I believe that I had a similar experience with Defendant compared to the
13 other class members because we were all hourly employees who worked for Defendant in
14 California. I have truthfully alleged in the Action that I was not paid all wages and
15 overtime owed (due to some work being done off the clock), I did not receive off duty 30
16 minute meal breaks within the first 5 hours of work, I did not receive off duty 10 minute
17 rest breaks for every 4 hours of work, and that I did not receive accurate wage statements
18 due to the above issues not being stated correctly on my wage statements (including my
19 hours worked and lack of all premium pay that I believe I am owed for missed meal and
20 rest breaks). I understand that Defendant denies my allegations. I believe that based on
21 my experience working for Defendant in California as an hourly-paid employee and the
22 issues I have raised in this case, my experience is common and very similar to that of the
23 other members of the class. From my experience working with other employees who
24 worked for Defendant, these are the same issues that other employees had and these are
25 the issues that this Action was filed in Court to address.

20. Based on my efforts in this case, finding a lawyer, organizing and providing numerous documents to my lawyer that were helpful to the case, numerous calls and emails with my lawyer, being named as a plaintiff in a lawsuit, participating in the court and settlement process, my participation in the lawsuit as summarized above, and the settlement we were able to achieve, I believe the requested Class Representative Service Payment of \$7,500 is appropriate.

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

Jose Rodriguez (Oct 19, 2025 14:37:14 PDT)

JOSE RODRIGUEZ

Oct 19, 2025