

Miriam L. Schimmel (State Bar No. 185089)
mschimmel@blackstonepc.com
Joana Fang (State Bar No. 309623)
jfang@blackstonepc.com
Alexandra Rose (State Bar No. 329407)
arose@blackstonepc.com
BLACKSTONE LAW, APC
8383 Wilshire Boulevard, Suite 745
Beverly Hills, California 90211
Tel: (310) 622-4278 / Fax: (855) 786-6356

Attorneys for Plaintiff Alexander Davis

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO

ALEXANDER DAVIS, individually, and on
behalf of similarly situated individuals and
members of the general public,

Plaintiff,

vs.

JAJ ROOFING DBA CITADEL ROOFING
AND SOLAR, a California corporation; and
DOES 1 through 25, inclusive,

Defendants.

Case No. 23CV011004

Honorable Lauri A. Damrell
Department 22

**DECLARATION OF ALEXANDER DAVIS
IN SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PAGA SETTLEMENT,
PAGA COUNSEL FEES PAYMENT, PAGA
COUNSEL LITIGATION EXPENSES
PAYMENT, PAGA REPRESENTATIVE
SERVICE AWARD, AND
ADMINISTRATION EXPENSES PAYMENT**

Reservation No. A-11004-001
Date: July 11, 2025
Time: 9:00 a.m.
Department: 22

Complaint Filed: November 2, 2023
FAC Filed: December 27, 2023
Trial Date: None Set

DECLARATION OF ALEXANDER DAVIS

I, Alexander Davis, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am the named plaintiff in the above-entitled action. 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 JAJ Roofing dba Citadel Roofing and Solar ("JAJ Roofing") as an hourly-paid, non-exempt Interconnection Specialist from approximately March 2022 to October 2022.

3. Because I thought the practices at JAJ Roofing may not be lawful, I decided to seek legal advice about my work experiences at JAJ Roofing and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps to make sure JAJ Roofing was held accountable for not properly compensating its employees for all hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits under the Private Attorneys General Act ("PAGA"), and what it meant to bring a class and PAGA action so that I understood what I was considering doing.

4. I have regularly communicated with my attorneys regarding the case and in order to fulfill my responsibilities as a PAGA representative. I have searched for and provided documents concerning my employment with JAJ Roofing, reviewed documents with my attorneys and answered their questions, provided information and guidance regarding the duties of other hourly-paid and/or non-exempt employees, and helped determine what other documents and information they could obtain from JAJ Roofing. I routinely checked in with my attorneys and their staff to make sure that they had all of my current information so that they could always reach me, and to provide any additional information that I had obtained.

///

///

///

1 5. I was always available to answer any questions my attorneys had and to speak and meet
2 with my attorneys whenever they needed me. I responded to them as quickly as possible and gave
3 them as much information as I could.

4 6. I understood that in the event this matter did not settle and proceeded with trial, I would
5 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
6 responsibilities that are necessary for this lawsuit.

7 7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
8 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
9 also understood there was a risk of losing any current job and/or income due to the time that I would
10 have to miss work in order to fulfill my duties and responsibilities in this matter, including having to
11 attend the trial, if needed. Most importantly, I believe that by pursuing this case, I have taken a
12 significant risk because future employers can easily find out that I sued my prior employer, and that
13 may negatively impact my ability to find employment within this industry – and even outside of it –
14 in the future. In contrast, the other employees who will be receiving money from this lawsuit did not
15 have to file a claim or take the risk that I took in bringing this action.

16 8. I reviewed the settlement agreement in this case and discussed it with my attorneys
17 before I signed it.

18 9. I believe that I have done everything that my attorneys have asked of me and tried, to
19 the best of my ability, to seek relief for the Aggrieved Employees and the State of California. I have
20 spent approximately 30-35 hours participating in this case as described above. I think my efforts
21 helped to get the result obtained in this case.

22 10. I understand that any resolution of this lawsuit on a representative basis is subject to
23 court approval. At all times throughout the course of this litigation I have considered the interests of
24 the Aggrieved Employees above my own personal interests.

25 11. I respectfully request that the Court approve and award me a PAGA Representative
26 Service Award in the amount of \$5,000.00 for my efforts and active participation in the case and for
27 the broader, general release of all claims that I have or may have against JAJ Roofing in connection
28 with the settlement. Taking into consideration the time that I dedicated to this case, I believe that this

1 amount is reasonable.

2 12. I am not related to anyone associated with Blackstone Law, APC.

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

5 Executed on 03/26/2025 at Citrus Heights, California.

6
7 *Alexander Davis*

8 Alexander Davis
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28