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Attorneys for Plaintiff William Ramirez and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

WILLIAM RAMIREZ, individually, and on
behalf of other members of the general public
similarly situated and other aggrieved
employees pursuant to the California Private
Attorneys General Act,

Plaintiff,

vs.

EMPLOYER SOLUTIONS STAFFING
GROUP LLC, a Minnesota limited liability
company; EMPLOYER SOLUTIONS
STAFFING GROUP II, LLC, a Minnesota
limited liability company; POTTER
ROEMER LLC, a California limited liability
company; and DOES 1 through 25, inclusive,

Defendants.

Case No.: 23STCV24735

Honorable William F. Highberger
Department SS10

**DECLARATION OF PLAINTIFF
WILLIAM RAMIREZ IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: May 14, 2025
Time: 10:30 a.m.
Dept: SS10

Complaint Filed: October 11, 2023
FAC Filed: January 16, 2024
SAC Filed: March 26, 2024
Trial Date: Not Set

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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-captioned case. 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 Defendants Employer Solutions Staffing Group LLC and Employer Solutions Staffing Group II, LLC (together, “ESSG”) and placed to work at Potter Roemer LLC (“Potter Roemer”) (collectively, with ESSG, “Defendants”) as an hourly-paid, non-exempt employee from approximately February 2019 to September 2020 and then again from approximately June 2021 to March 2022. I was employed by Potter Roemer directly as an hourly-paid, non-exempt Machine Operator from approximately March 2022 to April 2023. My job duties included, but were not limited to, loading CNC machines and cutting, grinding, and shaving material for welding purposes.
3. Because I thought the practices at Defendants may not be lawful, I decided to seek legal advice about my work experiences at Defendants 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 Defendants were 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 conferred with my attorneys regarding the case as part of my responsibilities as a class and PAGA representative. This process included searching for and providing documents concerning my employment with Defendants, answering any questions my attorneys had about the documents, providing information regarding the company’s practices and the duties of other hourly-paid and/or non-exempt employees, and helping my attorneys develop a strategy as to what additional documents and information they could seek to obtain from Defendants.

DECLARATION OF PLAINTIFF WILLIAM RAMIREZ

1 5. I routinely checked in with my attorneys and their staff to make sure that they had all
2 of my most current information and any additional information that I had obtained. I made myself
3 available to answer any questions my attorneys had about Defendants' practices and treatment of their
4 employees whenever they needed me. I responded to them as quickly as possible and gave them as
5 much information as I could. I also assisted my attorneys in preparing for mediation.

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

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

18 8. I reviewed the settlement agreement, discussed the settlement agreement with my
19 attorneys, and asked them questions before signing it.

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

24 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
25 approval, and any settlement must be designed in the best interest of the Class as a whole. At all times
26 throughout the course of this litigation I have considered the interests of the Class and put them before
27 my own personal interests.

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1 11. I understand that incentive or enhancement awards are discretionary and intended to
2 compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and
3 other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA
4 action, and an acknowledgment of the benefits resulting from the representative's actions. I believe
5 my work in this matter is meritorious on these points for the reasons set forth above.

6 12. I respectfully request that the Court approve and award me a Class Representative
7 Service Payment in the amount of \$5,000.00 for my efforts and active participation in the case and for
8 the broader, general release of all claims that I have or may have against Defendants in connection
9 with the settlement. Taking into consideration the time that I dedicated to this case, I believe that this
10 amount is reasonable.

11 13. I am not related to anyone associated with Blackstone Law, APC.

12 I declare under penalty of perjury under the laws of the State of California that the foregoing
13 is true and correct. Executed on 02/18/2025, at Pico Rivera, California.

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16 _____
William Ramirez