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Attorneys for Plaintiffs.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

ADAM BARRETT, an individual; and all
other current and former aggrieved employees
of Defendant,

Plaintiff,

vs.

ANDURIL INDUSTRIES, INC., a California
corporation; and DOES 1 through 10,
inclusive,

Defendant.

Case No.: 30-2024-01374656-CU-OE-CJC

Judge: Hon. Kimberly A. Knill
Dept: C31

**DECLARATION OF ADAM BARRETT
ISO MOTION FOR PRELIMINARY
APPROVAL OF JOINT STIPULATION
OF CLASS ACTION AND PAGA
SETTLEMENT**

Date: April 3, 2026
Time: 10:00 a.m.
Dept.: C31

I, Adam Barrett, declare as follows:

1 I have personal knowledge of the facts set forth in this Declaration and could and
would testify competently under oath if called as a witness. I understand that this is a class action
lawsuit alleging wage and hour violations under California law that has been filed against Anduril
Industries, Inc. (hereinafter referred to as "Anduril"), and that this Declaration will be used in
connection with this case.

2. I was hired by Anduril as a Production Coordinator in February of 2023. My
employment was terminated in August of 2023.

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**DECLARATION OF ADAM BARRETT ISO MOTION FOR PRELIMINARY APPROVAL OF
JOINT STIPULATION OF CLASS ACTION AND PAGA SETTLEMENT**

1 3. During my employment with Anduril, my schedule was generally 5:00 a.m.
2 to 4:30 p.m., Monday through Friday. Anduril scheduled lunch for the entire workforce at
3 12:00 noon, seven hours after my shift commenced.

4 4. I was never informed that I was entitled to rest breaks. With regard to “breaks,” I
5 was informed by my supervisor that I should “take a break when you need one,” which I
6 interpreted as a restroom break. I was not informed, and did not know, that I was entitled to a 10-
7 minute rest break for every four-hour work period, or major fraction thereof, and for that reason I
8 did not receive or take 10-minute rest breaks.

9 5. I was never paid a single meal period or rest break premium payment.

10 6. My supervisor would frequently hold meetings, which I was required to attend
11 (remotely), after I had clocked out for the day. These off-the-clock activities would typically last
12 two to three hours, and could occur two to three times per week.

13 7. My employment was terminated in August of 2023, I was not paid compensation
14 for the violations identified above, upon termination, or any time thereafter.

15 8. I believe that I am an adequate class representative because I was subjected to the
16 same policies and practices as the other employees. As a class representative, I understand that I
17 am representing the interests of all class members in this litigation. I understand and agree that, as
18 a class representative I have a duty to the class and must always consider the interests of the class
19 before my own, which I am willing to do, and have always done while serving as a class
20 representative. I am seeking the same damages and remedies as the other class members. I do not
21 have any known conflicts of interest with the class and my interests are the same as the class.

22 9. I understand that as a class representative I am responsible for testifying at the trial
23 of this case, and working with class counsel on behalf of absent class members. I understand I am
24 required to actively participate in the lawsuit.

25 10. During my time as a class representative, I made myself available to my attorneys
26 at their request and have had multiple meetings with my attorneys. I provided my attorneys
27 information upon their request on multiple occasions, and will continue to do so throughout this

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1 case. I have provided my attorneys with documents relating to my employment, and have spent
2 substantial time communicating with my attorneys regarding my experiences at Anduril. I have
3 also spent time searching for documents, consulting with class counsel regarding mediation,
4 making myself available for mediation, and reviewing and approving various documents,
5 including the Memorandum of Understanding and the Settlement Agreement. I would estimate
6 that I have spent in excess of 40 hours of my time in support of this class action, and have taken
7 risks on behalf of the Class, including risks to future employment, and financial risk relating to a
8 cost judgment if the lawsuit had not been successful.

9 11. As mentioned above, I understand that my participation in this lawsuit as a class
10 and PAGA representative creates very substantial risks for me. As mentioned, if the lawsuit was
11 ultimately unsuccessful, I could be subject to a cost judgment against me, potentially amounting to
12 thousands of dollars which I would then owe to my former employer. Furthermore, I understand
13 that my future employment is placed at very substantial risk by my decision to act as a class and
14 PAGA representative in this lawsuit. This lawsuit is a matter of public record, and any potential
15 employer to whom I apply for employment could easily discover that I had sued my former
16 employer in a class action, and for that reason deny me employment.

17 12. Notwithstanding the risks described above, I decided to act as a class and PAGA
18 representative to address the Labor Code and Wage Order violations suffered by my former co-
19 workers in addition to the violations suffered by me personally. I undertook these risks on behalf
20 of my former co-workers so that they would also receive compensation for these violations,
21 knowing that, while all members of the class will benefit from success, only I, as class
22 representative undertook the risks involved in obtaining this compensation.

23 13. While I did not type this declaration, I provided the information upon which it is
24 based, and I was given the opportunity to review it as well as ask questions and make changes.
25 This is an accurate summary of why I am adequate and fully capable of being a named Plaintiff in

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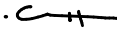
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1 this action, how I have actively participated in the case up to this point, and why I think an
2 enhancement of \$7,500 to myself is fair and reasonable.

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

5 Executed on November 18, 2025 at Fontana, California.

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7 _____
Adam Barrett