

Charles T. Sweeny (SBN 325167)
charlie@sweenylaw.com
SWEENY LAW, PC
8605 Santa Monica Blvd., #618463
Los Angeles, California 90069
Telephone: (310) 658-2112

Joanna Ghosh (SBN 272479)
Daniel Bass (SBN 287466)
Brian J. St. John (SBN 304112)
LAWYERS for JUSTICE, PC
450 N. Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

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

Plaintiff,

vs.

HCI SYSTEMS, INC., a California corporation;
and DOES 1 through 100, inclusive,

Defendants.

Case No.: CIVSB2408988

Honorable Stephanie Tañada
Department S33

**DECLARATION OF DANIEL CISNEROS IN
SUPPORT OF PLAINTIFF'S MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT (CAL. LABOR CODE § 2698,
ET SEQ.) SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEYS' FEES AND COSTS,
GENERAL RELEASE FEE, AND
SETTLEMENT ADMINISTRATION COSTS**

Date: April 9, 2026
Time: 8:30 a.m.
Department: S33

Complaint Filed: March 18, 2024
Trial Date: None Set

DECLARATION OF DANIEL CISNEROS

I, Daniel Cisneros, hereby declare as follows:

1. I am over 18 years of age and a resident 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 HCI Systems, Inc. ("Defendant") from approximately October 2022 to approximately March 2023 as a non-exempt, hourly-paid employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant paid me and other employees what was owed to us and was held accountable for its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately 4 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for approximately 3 hours discussing my situation, representative action lawsuits under the Private Attorney General Act ("PAGA"), and what it meant to bring be a PAGA representative.

3. I have spent over 15 hours communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included preparing and ultimately providing a declaration to my attorneys to oppose Defendant's Motion to Compel Arbitration, gathering documents concerning my employment with Defendant reviewing documents with my attorneys, providing information regarding the duties of hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had and was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent several hours speaking with my attorneys about the case and assisting with the mediation to identify potential witnesses, explain documents and information concerning the case, and also describing

1 Defendant's policies, practices, and procedures.

2 5. As far as the settlement is concerned, I was available to review documents and answer any
3 questions my attorneys had. I spent about 3 hours reviewing and asking questions about the settlement
4 agreements, which included a memorandum of understanding and two separate settlement agreements,
5 the latter of which I understood required revisions to comply with this Court's approval procedures for
6 representative PAGA cases like this, all before signing them.

7 6. I believe that I have done everything that my attorneys have asked of me and have tried,
8 to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think
9 my efforts helped to get the result obtained in this case.

10 7. For my efforts in service of the aggrieved employees and the State of California and for
11 my broader release of claims, I respectfully request that the Court award me full payment of the \$5,000.00
12 General Release Fee.

13 8. I am not related to anyone associated with Sweeny Law, PC or Lawyers *for* Justice, PC.

14 9. I have not entered into any undisclosed agreements, nor have I received any undisclosed
15 compensation in this case beyond that described in the Settlement Agreement, including the separate
16 individual settlement agreement for \$5,000.00 to resolve my non-PAGA claims, individual Stand-Alone
17 Claims that I understand were compelled to arbitration on an individual basis by this Court's order issued
18 on July 30, 2024 (the "Arbitration Order").

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

21 Executed this 17th day of March 2026, at Moreno Valley, California.

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Daniel Cisneros (Mar 17, 2026 17:39:48 PDT)

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