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Attorneys for Plaintiff
PLACIDO LOPEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

PLACIDO LOPEZ, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

SIMPSON LABS, LLC, a California
limited liability company; PARTNERS
PERSONNEL- MANAGEMENT
SERVICES, LLC, a Delaware limited
liability company; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 223STCV27829

*[Assigned for all purposes to the Hon. Samantha
P. Jessner, Dept. 7]*

**DECLARATION OF PLAINTIFF
PLACIDO LOPEZ IN SUPPORT OF
PLAINTIFF'S MOTION FOR SETTLEMENT
APPROVAL OF CLAIMS BROUGHT
UNDER THE PRIVATE ATTORNEYS
GENERAL ACT AND REASONABLE
ATTORNEYS' FEES, COSTS, AND
ENHANCEMENT AWARD**

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I, PLACIDO LOPEZ, declare as follows:

1. I am an individual over the age of 18 and the named plaintiff in this matter. This declaration is submitted in support of approval of the proposed Private Attorneys General Act (“PAGA”) settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Defendant Simpson Labs, LLC through the staffing agency, Defendant Partners Personnel-Management Services, LLC (collectively “Defendants”).

3. I have been employed by Defendants as a non-exempt employee since approximately 2018 and operated a Forklift. While working for Defendants, I was subject to Defendants' wage and hour policies and practices.

4. It is my understanding that I was not compensated for all of my time worked. Specifically, I am informed and believe that Defendants shaved or rounded my time worked so that I was not paid minimum wage for all hours worked and was not paid overtime wages when I worked more than eight (8) hours in a workday or 40 hours in a workweek.

5. I do not believe I received all legally-compliant meal periods. My lunch break often times took place after five hours of work. Often, I was not provided a second meal period when I worked more than 10 hours in a day.

6. I also do not believe I received all legally-compliant rest periods. I was not authorized to take a rest period for every four hours that I worked because of Defendants' work demands.

7. As a result of these violations, I also do not believe I received accurate and complete wage statements.

8. I retained Haines Law Group, APC and Lidman Law, APC to represent me in my Labor Code violation claims against Defendants.

9. At the time of filing this lawsuit, I understood that this lawsuit had the chance to benefit my former co-workers and current employees of Defendants by helping them recover

1 unpaid penalties for various Labor Code violations, including failure to pay all overtime wages
2 owed, minimum wage violations, failure to provide meal periods, failure to authorize and permit
3 rest periods, failure to provide accurate itemized wage statements, and failure to maintain accurate
4 records. As the named Plaintiff I knew that I would be taking on certain risks that the other
5 employees would not have to bear. I knew that there was a risk that I could be liable for
6 Defendants' costs if we lost the case. I accepted these risks because I wanted Defendants to
7 compensate its former and current employees and to fix its pay practices. Even though I
8 understood that joining a lawsuit is a public record and could stigmatize me and may affect my
9 future employability because employers do not like to hire employees who have filed lawsuits
10 against their prior employers, I accepted that burden for the benefit of other employees of
11 Defendants. Indeed, if I had not sought legal representation to enforce California's labor laws, I
12 do not believe my former co-workers would have brought a lawsuit against Defendants. I do not
13 believe that my former co-workers and California's Labor and Workforce Development Agency
14 ("LWDA"), which I understand receives a portion of the proposed settlement, would have
15 received any of these funds. Without counsel and my assistance, I do not believe we would have
16 gotten the proposed settlement.

17 10. After the lawsuit was filed, I continued to work closely with my lawyers. I
18 worked with my lawyers to prepare for the mediation and was available that day for any
19 questions that arose. I spent time discussing the proposed settlement with my attorneys. I wanted
20 to understand everything before I signed it. I believed I represented the aggrieved employees
21 and the LWDA to the best of my ability and put the interests of the aggrieved employees ahead
22 of my own. I estimate that I have spent ten to twelve hours on this case.

23 11. As part of the proposed Settlement, I have agreed to release Defendant and
24 Released Parties from any and all of the PAGA Released Claims that arose during the PAGA
25 Period.
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1 12. I understand that my attorneys will request that the Court award me an
2 enhancement award of \$10,000.00 for my service and efforts on the case. This proposed
3 \$10,000.00 enhancement award is not contingent upon me supporting the proposed Settlement.

4 I declare under penalty of perjury under the laws of the United States and state of
5 California that the foregoing is true and correct. Executed on 03/25, 2026 at Newhall,
6 California.

Placido Lopez

Placido Lopez