

1 MARALLE MESSRELIAN (SBN 316974)

2 maralle@mmlawapc.com

3 MM LAW, APC

4 500 N. Brand Blvd., Ste 2000

5 Glendale, CA 91203

6 Telephone (818) 810-7747

7 Facsimile (818) 230-9018

8 Attorneys for Plaintiff,

9 JESSE ALTAMIRANO, and all others similarly situated

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **FOR THE COUNTY OF LOS ANGELES-CENTRAL DISTRICT**

12 **(UNLIMITED JURISDICTION)**

13 JESSE ALTAMIRANO, as an “aggrieved
14 employee” on behalf of himself and other
15 similarly situated “aggrieved employees”
16 under the Labor Code Private Attorneys
17 General Act of 2004,

18 *Plaintiff,*

19 vs.

20 WEBER METALS, INC., a California
21 corporation; and DOES 1 to 25, inclusive,

22 *Defendants.*

Case No.: 24STCV05326

**DECLARATION OF JESSE ALTAMIRANO
IN SUPPORT OF PLAINTIFF’S MOTION
FOR APPROVAL OF PAGA SETTLEMENT**

Action filed: February 29, 2024

Hearing Date: August 4, 2025

Hearing Time: 8:30 a.m.

Hearing Dept: 26, Hon. Bradley Phillips

Reservation Number: 344979904839

DECLARATION OF JESSE ALTAMIRANO IN SUPPORT OF
PAGA SETTLEMENT AND RELEASE

I, JESSE ALTAMIRANO, declare and state as follows:

1. I am a resident of the State of California and am over 18 years of age. I am the named Plaintiff in this action and am represented by Maralle Messrelan of MM Law, APC in this action. Except as otherwise stated, I have personal knowledge of all matters set forth in this declaration and could and would competently testify thereto if called upon to do so as a witness.

2. I first started working for Defendant Weber Metals, Inc. ("WEBER") on or around July 11, 2015 as a "Die Forge Helper." After being laid off during the COVID-19 pandemic, I was re-hired by WEBER on or around May 16, 2022 to work as a "Saw Operator II" at the 60-ton press building located at 16706 Garfield Ave. in Paramount, California. My employment with Defendants ended on or around December 4, 2023.

3. I understand that this lawsuit is a Private Attorney General action, otherwise known as a PAGA lawsuit. I understand that I am the Plaintiff and that WEBER is the Defendant. I understand that my name is on the cover of the lawsuit. I understand that I am the representative of other WEBER employees. As the representative in this lawsuit, I have duties to the State of California and other employees like me who were not paid for all hours worked at the correct rates of pay, provided all required meal and rest periods, and reimbursed for necessary business expenses, such as tools and personal mobile phones for work purposes. I also understand that my lawsuit is on behalf of the State of California. I have fairly represented the other employees and the State throughout this lawsuit. I don't have any disagreements with the other WEBER employees I represent. I am not aware of any reason why I can't make the best decisions for them in this lawsuit.

4. When I agreed to hire my attorneys to file this lawsuit, I also agreed that I would be the representative of the other employees and the State of California. I agreed that the interests of the other employees and the State in the lawsuit are as important as my personal interests in suing WEBER. I agreed that I would do what is in the best interest of the other employees and the State when deciding whether or not to settle this lawsuit. I also agreed to actively participate in the lawsuit. I also understand that there will only be a settlement of the lawsuit if the Court allows it.

5. The PAGA statute does not forbid service awards. Courts frequently award them

1 in PAGA-only cases as well. The work I have done on this case includes hiring my attorneys,
2 speaking with my attorneys on many occasions by phone, explaining what my employment at
3 WEBER was like, explaining what my employment at WEBER had in common with other
4 employees who worked for WEBER, explaining my claims to my attorneys, having my
5 deposition taken by Defendant, participating in mediation, and communicating with my
6 attorneys about the settlement agreement and related documents. Despite this, I am **not** asking
7 for a service award for my involvement and the time I spent assisting my counsel with the PAGA
8 action.

9 6. I negotiated an individual settlement of my harassment and constructive
10 wrongful discharge claims after the Parties had agreed to the Settlement of the PAGA action.

11 7. As part of my individual settlement, I signed a general release of all claims,
12 whether known or unknown, that I may have against Defendant, not only PAGA claims.

13 8. I don't believe that my individual settlement has any bearing on whether I have
14 served the Aggrieved Employees' best interests and will continue to do so. Nevertheless, I am
15 willing to provide it to the Court *in camera* if the Court so requests.

16 I declare under the penalty of perjury of the laws of the State of California that the
17 foregoing is true and correct to the best of my knowledge.

18 Executed on June 16, 2025 at Lynwood, California.

19 
Jesse Altamirano (Jun 16, 2025 13:38 PDT)

20 JESSE ALTAMIRANO,
21 Declarant