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Attorneys for Plaintiffs Michael Monteleone and Teresa Maciel

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN JOAQUIN

MICHAEL MONTELEONE, individually, and on
behalf of other members of the general public
similarly situated, and as an aggrieved employee
pursuant to the Private Attorneys General Act
("PAGA"),

Plaintiff,

vs.

SCHELL & KAMPETER, INC., a Missouri
corporation, and DOES 1 through 10, inclusive,

Defendants.

Case No.: STK-CV-UOE-2023-0011330

**DECLARATION OF TERESA MACIEL
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date:

Time: 9:00 am

Dept: 10C

I, Teresa Maciel, declare:

1. I am a Plaintiff in the above-captioned action and am a former employee of Defendant Schell & Kampeter, Inc. ("Defendant").

2. I have personal knowledge of the matters set forth herein and, if called upon to do so, could and would competently testify thereto under oath.

3. I worked for Defendant as a non-exempt employee for nearly a decade. During the Class Period, I was employed by Defendant as a non-exempt Quality Control Technician. My employment ended on or about September 26, 2023.

4. I experienced what I believed to be violations of the Labor Code during my employment with Defendant, which included not being paid overtime, sick pay, and meal and rest break premium pay at the correct rate, not being afforded all meal and rest breaks I believed I was entitled to under California law, not being paid for all of the hours I worked, not being reimbursed for work related cellular phone use, and not receiving accurate wage statements.

5. Because of what I believed to have been Labor Code violations committed against me, I sought out and retained attorneys to represent me in my claims against Defendant. It is my opinion that my attorneys are well-qualified to represent me and the class members in this action and have acted accordingly.

6. Throughout the course of this litigation, I have been an active participant. I estimate that I have spent approximately 24 hours to date actively participating in this case, including reviewing documents, looking for documents relating to the case and the violations I believed were committed against me, speaking with my attorneys and providing input about the facts of the case, participating in mediation, reviewing documents from my attorneys relating to the case and providing my input, and helping to prepare and review this declaration in support of the motion for preliminary approval.

7. I recognize that, as a named Plaintiff in this action, should Defendant ultimately prevail on its claims, I face the risk of shouldering responsibility for paying Defendant's costs in this matter, a risk not faced by any of the unnamed class members in this Action.

8. I understand and accept my role as class representative in this action, and I understand and accept my ongoing role as a representative for the other unnamed class members.

9. I understand and accept that I have a continuing responsibility to look out for the interests of the Class.

10. I have been, and continue to be, willing to have my name used in this lawsuit, despite the potential reputational risks it poses to me with respect to employers learning about this lawsuit. While I understand it is unlawful for employers to refuse to hire or to take action against me for having filed suit against Defendant, I am also aware of the reality that some employers nonetheless do take that into account.

11. I am not receiving any compensation for my claims against Defendant beyond what is requested in the Settlement Agreement presently before the Court, i.e., my own proportional share of the settlement fund and my requested \$10,000 enhancement payment.

12. I am fully informed about the settlement agreement, and the amounts proposed to be paid to the Class Members to resolve their claims against Defendant arising from the allegations in my pleadings. I believe that the amounts agreed to be paid are fair, adequate, and reasonable, and I fully support approval of the settlement agreement.

13. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the settlement agreement.

14. I am not aware of any actual or potential conflicts of interest between me and any of the Class Members in this action.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct. Executed on 10/16/2025 in Upper Marlboro, Maryland.

DocuSigned by:

Teresa Maciel

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TERESA MACIEL

PROOF OF SERVICE

I, the undersigned, certify and declare as follows:

I am over the age of eighteen years and not a party to this action. My business address is 112 S. Church St., Lodi, California 95240, that is located in the county where the delivery below took place.

On November 5, 2025, I served the following document:

**DECLARATION OF TERESA MACIEL IN SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**

addressed to:

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☒ **BY EMAIL:** In accordance with Code of Civil Procedure Section 1010.6, and per the agreement of the parties to accept service by email, on the date specified below, I caused a copy of the document described above to be sent to the person(s) at the e-mail address(es) listed above. My business e-mail address is jzeyen@mayallaw.com.

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

Executed on November 5, 2025, at Lodi, California.


JULIE ZEYEN