

Arby Aiwarzian (SBN 269827)
Yasmin Hosseini (SBN 326399)
Ryan Slinger (SBN 351297)
LAWYERS for JUSTICE, PC
450 North 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 VENTURA**

LETICIA ACEVEDO, 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.

TURBONETICS HOLDINGS, INC., a
Delaware corporation; TURBONETICS,
INC., an unknown business entity;
WABTEC CORPORATION, an
unknown business entity;
MOTIVEPOWER, INC., an unknown
business entity; NORDCO RAIL
SERVICES, LLC, an unknown business
entity; NORDCO, INC., an unknown
business entity, RICON CORP., an
unknown business entity;
SHUTTLEWAGON, INC., an unknown
business entity; TRANSPORTATION
SYSTEMS SERVICES OPERATIONS
INC., an unknown business entity;
WABTEC MANUFACTURING
SOLUTION LLC, an unknown business
entity; WABTEC RAILWAY
ELECTRONICS, INC., an unknown
business entity; WABTEC US RAIL,
INC., an unknown business entity;
WESTINGHOUSE AIR BRAKE
TECHNOLOGIES CORPORATION, an
unknown business entity; XORAIL,
INC., an unknown business entity;
WABTEC TRANSPORTATION

Case No. 2023CUOE008785

Honorable Charmain H. Buehner
Department 44

CLASS ACTION

**DECLARATION OF LETICIA ACEVEDO
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Hearing Date: February 25, 2026
Hearing Time: 1:30 p.m.
Department: 44

Complaint Filed: May 9, 2023
FAC Filed: August 26, 2025
Trial Date: None Set

SYSTEMS, LLC, an unknown business
entity; and DOES 1 through 100,
inclusive,

Defendants.

DECLARATION OF LETICIA ACEVEDO

I, **Leticia Acevedo**, 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 Turbonetics Holdings, Inc., from approximately August 2005 to approximately March 2006, and from approximately January 2007 to approximately September 2021 as an hourly-paid, non-exempt employee. Turbonetics Holdings, Inc., MotivePower, Inc., Nordco Rail Services, LLC, Nordco, Inc., Ricon Corp., Shuttlewagon, Inc., Transportation Systems Services Operations Inc., Wabtec Manufacturing Solution LLC, Wabtec Railway Electronics, Inc., Wabtec US Rail, Inc., Westinghouse Air Brake Technologies Corporation, Xorail, Inc., Wabtec Transportation Systems, LLC, Turbonetics, Inc., and Wabtec Corporation are collectively referred to as “Defendants”. I decided to seek legal advice about my experience working for Defendants and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure Defendants were held accountable for not properly compensating employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading employment law firms in California for approximately 2 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for approximately 5 hours to discuss my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to potentially be a named plaintiff, class representative, and PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a class representative, and also, if class certification were to be obtained, what my duties and responsibilities would be in that event.

3. I have spent over 6 hours communicating with my attorneys and fulfilling my responsibilities as a class representative in this case, which included gathering documents

1 concerning my employment with Defendants, reviewing documents with my attorneys,
2 answering their questions, providing guidance regarding the work performed by other non-
3 exempt employees, and helping develop a strategy as to what documents and information to
4 obtain from Defendants. I frequently checked in with my attorneys and their staff to make sure
5 that they had my most current information and to provide them with any additional information
6 that I had obtained.

7 4. Throughout the case, I was available to answer any questions my attorneys had,
8 and available to speak and meet with my attorneys whenever they needed me. I responded to my
9 attorneys as quickly as possible and gave them as much information and identified as many
10 documents as I could. I spent at least 4 additional hours speaking with my attorneys about the
11 case, identifying potential witnesses, providing my attorneys with documents and information
12 concerning the case, and describing the policies, practices, and procedures of Defendants.

13 5. As far as the settlement is concerned, I was available to review documents and
14 answer any questions my attorneys had. I spent about 2 hours reviewing the settlement papers
15 and about 1 hour asking questions and discussing the potential settlement with my attorneys
16 before signing the settlement papers.

17 6. I understand that a settlement has been reached in my case and what my duties
18 and responsibilities are as a class and PAGA representative. For example, I am aware that if the
19 settlement is granted preliminary approval, the Court will certify a class for settlement purposes,
20 and likely appoint me as the representative of the class and my attorneys as counsel for the class.
21 I also understand that my duties will include checking in on, monitoring, and conferring with my
22 attorneys and counsel for the class to facilitate the notice and settlement administration process,
23 and to provide information that the Court needs to assess whether the settlement is fair,
24 reasonable, and adequate. Further, if any individuals who are potential class members contact
25 me, I will take steps to have them referred to the Court-appointed settlement administrator so that
26 these individuals may receive the necessary information and notice they may be eligible to
27 receive in connection with the settlement and contemplated final approval hearing.
28

1 7. I believe that I have done everything that my attorneys have asked of me and have
2 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class
3 members and aggrieved employees. I have volunteered to represent and champion the interests
4 of many other people with similar claims and injuries because of the importance of the case and
5 the necessity that all class members and aggrieved employees benefit from the lawsuit equally. I
6 understand that as a proposed class representative, and if formally appointed as a class
7 representative, I have and continue to represent the interests of all members of the class in
8 litigation to recover relief for the class. I have claims that are typical of those of the class,
9 consider the interests of the class just as I would consider my own interests and understand that I
10 may need to put the interests of the class before my own interests. I have and continue to
11 actively participate in the lawsuit, as necessary, and if required, I will provide trial testimony. I
12 understand that any resolution of the lawsuit is subject to court approval, and must be in the best
13 interest of the class as a whole. I have also actively followed and monitored, and continue to
14 follow and monitor, the progress of the lawsuit, and have taken steps to make sure, and continue
15 to make sure, that the litigation is prosecuted by the skilled and effective attorneys that I have
16 retained. I believe that I have no interests which are inconsistent with the interests of the class
17 and that I have, and will continue to, adequately represent the class.

18 8. I think my efforts helped to get the result obtained in this case, and as a potential
19 class and PAGA representative, I respectfully request that the Court approve and award me an
20 enhancement award in the amount of \$10,000.00 for my efforts and active participation in this
21 case, as well as my broader release of claims. Taking into consideration the time that I have
22 dedicated to this case, I believe that this amount is reasonable.

23 9. I am not related to anyone associated with Lawyers *for* Justice, PC.

24 10. I have not entered into any undisclosed agreements, nor have I received any
25 undisclosed compensation in this case. The only compensation I will receive is whatever amount
26 the Court awards as an enhancement award, as well as my share of the settlement as a class
27 member and aggrieved employee.

28 I declare under penalty of perjury under the laws of the State of California that the

foregoing is true and correct.

Executed on 10/01/2025, at Palmdale, California.

Electronically Signed 2025-10-01 19:18:12 UTC - 172.56.123.241
Nintex AssureSign® 8f526c2-b7fc-40e8-ba4e-b36801309f1c

Leticia Acevedo