

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;

Plaintiff,

vs.

TURBONETICS HOLDINGS, INC., a
Delaware corporation; TURBONETICS,
INC., an unknown business entity;
WABTEC CORPORATION, an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 2023CUOE008785

Honorable Mark S. Borrell
Department 40

CLASS ACTION

DECLARATION OF LETICIA ACEVEDO

Hearing Date: September 2, 2025
Hearing Time: 8:30 a.m.
Department: 40

Complaint Filed: May 9, 2023
Jury Trial Date: None Set

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 work experiences with Defendants 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 Defendants were held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers for Justice, PC discussing 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 be a named plaintiff, class representative, and a PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of

1 other non-exempt employees, and helping develop a strategy as to what documents and
2 information to obtain from Defendants. I routinely checked in with my attorneys and their staff to
3 make sure that they had all of my most current information and any additional information that I
4 had obtained.

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

11 5. As far as the settlement is concerned, I was available to review documents and
12 answer any questions my attorneys had. I reviewed the Settlement Agreement and discussed the
13 questions I had regarding the potential settlement with my attorneys before signing the settlement
14 papers.

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

26 7. I believe that I have done everything that my attorneys have asked of me and have
27 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class
28 members and the State of California with respect to aggrieved employees. I have volunteered to

1 represent and champion the interests of many other people with similar claims and injuries because
2 of the importance of the case and the necessity that all class members and aggrieved employees
3 benefit from the lawsuit equally. I understand that as a proposed class representative, and if
4 formally appointed as a class representative, I have and continue to represent the interests of all
5 members of the class in litigation to recover relief for the class. As an hourly-paid employee of
6 Defendants who was subject to the same policies, practices, and procedures as the other members
7 of the class, I have claims that are typical of those of the class. I consider the interests of the class
8 just as I would consider my own interests. I understand that I may need to put the interests of the
9 class before my own interests, although I have no reason to believe that my interests are in conflict
10 with the interests of the class. I understand that any resolution of the lawsuit is subject to court
11 approval and must be in the best interest of the class as a whole. I have participated, and continue
12 to participate, in the lawsuit as necessary. I have actively followed and monitored the progress of
13 the lawsuit, and have taken steps to make sure that the litigation is prosecuted by the skilled and
14 effective attorneys that I have retained.

15 8. I think my efforts helped to get the result obtained in this matter, and as a potential
16 class and PAGA representative, I respectfully request that the Court award me an enhancement
17 award for my efforts in pursuing and participating in this matter, as well as my broader release of
18 claims. Taking into consideration the time that I have dedicated to this matter, I believe that this
19 amount is reasonable.

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

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

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

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Executed on 07/31/2025, at Palmdale, California

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Leticia Acevedo