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Attorneys for Plaintiff LUIS A. ROMERO,
individually, and on behalf of Aggrieved Employees
pursuant to the California Private Attorneys General Act

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

LUIS A. ROMERO, individually, and on
behalf of Aggrieved Employees pursuant to
the California Private Attorneys General Act,

Plaintiffs,

vs.

THYSSENKRUPP MATERIALS, LLC, a
Michigan limited liability company; and DOES
1 through 25, inclusive,

Defendants.

Case No. 24STCV03007

Honorable Carolyn B. Kuhl
Department 12

**DECLARATION OF LUIS A. ROMERO IN
SUPPORT OF PLAINTIFF'S MOTION FOR
APPROVAL OF PAGA SETTLEMENT,
PAGA COUNSEL FEES PAYMENT, PAGA
COUNSEL LITIGATION EXPENSES
PAYMENT, PAGA REPRESENTATIVE
SERVICE PAYMENT, AND
ADMINISTRATION EXPENSES PAYMENT**

Date: September 22, 2026
Time: 1:45 p.m.
Department: 12

Complaint Filed: February 5, 2024
Trial Date: Not Set

DECLARATION OF LUIS A. ROMERO

I, Luis A. Romero, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am the named plaintiff in the above-entitled action. 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 Defendant Thyssenkrupp Materials, LLC (“Defendant”) as an hourly-paid, non-exempt employee in the positions of Receiver, Material Control Operator, and Material Control Operator II from approximately April 2018 through approximately February 2023.

3. Because I thought the practices at Defendant may not be lawful, I decided to seek legal advice about my work experiences at Defendant and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps to make sure Defendant was held accountable for not properly compensating its employees for all hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits under the Private Attorneys General Act (“PAGA”), and what it meant to bring a class and PAGA action so that I understood what I was considering doing.

4. I have regularly communicated with my attorneys regarding the case and in order to fulfill my responsibilities as a PAGA representative. I have searched for and provided documents concerning my employment with Defendant, reviewed documents with my attorneys and answered their questions, provided information and guidance regarding the duties of other non-exempt employees, and helped determine what other documents and information they could obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my current information so that they could always reach me, and to provide any additional information that I had obtained.

5. I was always available to answer any questions my attorneys had and to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could.

1 6. I understood that in the event this matter did not settle and proceeded with trial, I would
2 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
3 responsibilities that are necessary for this lawsuit.

4 7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
5 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
6 also understood there was a risk of losing any current job and/or income due to the time that I would
7 have to miss work in order to fulfill my duties and responsibilities in this matter, including having to
8 attend the trial, if needed. In contrast, the other employees who will be receiving money from this
9 lawsuit did not have to file a claim or take the risk that I took in bringing this action.

10 8. I reviewed the settlement agreement in this case and discussed it with my attorneys
11 before I signed it.

12 9. I believe that I have done everything that my attorneys have asked of me and tried, to
13 the best of my ability, to seek relief for the Aggrieved Employees and the State of California. I have
14 spent approximately 35-40 hours participating in this case as described above. I think my efforts
15 helped to get the result obtained in this case.

16 10. I understand that any resolution of this lawsuit on a representative basis is subject to
17 court approval. At all times throughout the course of this litigation I have considered the interests of
18 the Aggrieved Employees above my own personal interests.

19 11. I respectfully request that the Court approve and award me a PAGA Representative
20 Service Payment in the amount of \$5,000.00 for my efforts and active participation in the case and for
21 the broader, general release of all claims that I have or may have against Defendant in connection with
22 the settlement. Taking into consideration the time that I dedicated to this case, I believe that this
23 amount is reasonable.

24 12. I am not related to anyone associated with Blackstone Law, APC.

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

3 Executed on 07/20/2026 at La Puente, California.

4 *Luis Romero*

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6 Luis A. Romero
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