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Attorneys for Plaintiff RUBY PELAYO
and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

RUBY PELAYO, an individual, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

HONEYWELL SAFETY PRODUCTS USA,
INC., a Delaware corporation, and DOES 1
through 50,

Defendants

) **Case No.: 37-2023-00055510-CU-OE-**
) **CTL**

) **DECLARATION OF JOE VIRGILIO IN**
) **SUPPORT OF PLAINTIFF'S**
) **UNOPPOSED MOTION FOR**
) **PRELIMINARY APPROVAL OF**
) **CLASS AND REPRESENTATIVE**
) **ACTION SETTLEMENT**

) Hearing Information:

) Date: April 24, 2026

) Time: 1:30 p.m.

) Dept.: C-63

) Hon. Katherine A. Bacal

) Action Filed: December 22, 2023

I, JOE VIRGILIO, declare and state as follows:

2. The following facts are within my own personal knowledge, and if called as a witness, I could testify competently to the matters stated herein.

4. On March 27, 2026, I filed the Settlement Agreement, the Motion for Preliminary Approval, and associated documents with the LWDA via their online portal.

5. I gained my bachelor's degree at the University of California, San Diego, in 2009.
6. I went to law school at Thomas Jefferson School of Law, earning my degree in 2019.
7. I have been employed at Pancer Law Corporation as an associate since 2024.
8. I became a member of the State Bar of California in June of 2022.
9. At all times, I have been the attorney of record in the above-entitled action.
10. I have experience in wage and hour class action and PAGA litigation.
11. I focus my practice on prosecuting employment law claims on behalf of employee-
ffs, and personal injury cases.
12. A very small amount of my practice is devoted to other matters.
13. I have experience in employment-related, representative actions. Of these cases, some

have resulted in court approved settlements, some are ongoing, and some resolved on an individual basis.

1 14. I have been participating in, and approved as, class counsel, on class and representative
2 cases since 2024. I have been counsel of record in multiple putative class actions and Private
3 Attorneys General Act (PAGA) cases. I have been appointed as class counsel in the following
4 class action cases:

5 • *Vang v. Stanton Optical, et al.*, Madera County Superior Court case number
6 MCV090610

7 • *Reed v. Centria Healthcare, LLC, et al.*, San Diego County Superior Court case number
8 37-2023-00017173-CU-OE-CTL

9 **Conclusion**

10 For all the foregoing reasons, the parties very respectfully request this Court to judicially
11 approve the Class Settlement and sign the [Proposed] Order filed herewith.

12
13 Except as to those matters stated on information and belief, I declare under penalty of perjury
14 under the laws of the State of California that the foregoing is true and correct. Executed March 27,
15 2026, at San Diego, California

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17 By: /s/ Joe Virgilio

18 Declarant, Joe Virgilio
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