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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 RUBY PELAYO**
) **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

1 I, Ruby Pelayo, declare as follows:

2 1. I am named plaintiff in the above-captioned matter. I have personal knowledge of the
3 facts contained herein, and if called as a witness, would and could competently testify thereto.

4 2. I have been actively participating in this matter since before it was filed. While I do
5 have individual claims for unpaid wages and unpaid reimbursements, I also have claims aligned with
6 the only class and representative claim for the wrong employer listed on my wage statement, as does
7 the entirety of the defined class.

8 3. My employer in California was Honeywell Safety Products USA, Inc. My wage
9 statements reflected the employer as Honeywell International, Inc., which is incorrect.

10 4. During discovery I learned that all employees in California also had the incorrect
11 employer named on all wage statements. Accordingly, my interest in certifying this wage statement
12 class aligns with all other HSP California employees.

13 5. I have always and continue to cooperate with my attorneys to prosecute this litigation
14 and effectuate the proposed settlement to the extent necessary.

15 6. I understand that I am acting as a fiduciary for the absent class members with respect
16 to the inaccurate wage statements.

17
18 I declare under penalty of perjury under the laws of the State of California that the foregoing is
19 true and correct. Executed this 03 / 23 / 2026 day of March, at San Diego, California.

20 

21 _____
Ruby Pelayo

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