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Attorneys for Plaintiff JAIME DOJAQUEZ,
an individual and as proxy for the Labor and
Workforce Development Agency

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF KERN

JAIME DOJAQUEZ, an individual and
as proxy for the Labor and Workforce
Development Agency

Plaintiff,

vs.

KERN RIVER CONSULTING, INC., a
corporation; SME STEEL
CONTRACTORS, INC., a corporation;
SOUTHWEST STEEL OF
CALIFORNIA, INC., a corporation;
JAMES RIVERA, an individual, and
DOES 1-100, inclusive,

Defendants.

CASE NO: BCV-24-101168

DECLARATION OF JAIME DOJAQUEZ
IN SUPPORT OF MOTION TO APPROVE
PAGA SETTLEMENT

Date:
Time:
Dept.:

I, Jaime Dojaquez, declare:

1. I have personal knowledge of the matters set forth herein and, if called upon to testify, could and would competently testify thereto.

2. I am the Plaintiff in this action.

3. I performed work for Defendant Kern River Consulting ("Kern River") as a safety consultant, and worked on projects in California run by Defendants Southwest Steel of California, Inc. and SME Steel Contractors, Inc.

4. While I worked on projects for Defendants, I was classified as an independent contractor, however I believed that I was actually an employee. Because I suspected that I was not being paid properly and not being reimbursed for things like mileage and lodging, I sought out counsel to evaluate my situation.

5. I had many conversations with my attorneys over the course of this action, providing them with factual information and documents related to my case, discussing the legal and factual bases for my claims, discussing litigation strategies, and assisting with and participating in mediation.

6. I estimate that I spent approximately 15 hours working on this matter, including talking with other co-workers, reviewing documents, investigating my claims, and working with my attorneys.

7. I also was aware that putting my name on a lawsuit could expose me to risks relating to future employment in my industry should prospective employers learn of my lawsuit and be wary of hiring me as a result.

8. Like my counsel, I believe that the settlement in this action is a fair, reasonable, and adequate compromise of the PAGA claims.

I declare the foregoing is true and correct under penalty of perjury under the laws of the State of California. Executed on 10/28/2024, in Rico Rico, Arizona.

Signed by: 
D8E8E4DA71744E... JAIME DOJAQUEZ