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Attorneys for Plaintiff,
DAVID HERRERIA TORRES, and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES-CENTRAL DISTRICT

(*UNLIMITED JURISDICTION*)

DAVID HERRERIA TORRES, as an "aggrieved employee" on behalf of himself and other similarly situated "aggrieved employees" under the Labor Code Private Attorneys General Act of 2004,

Plaintiff,

vs.

JMG SPECIALTIES, INC., a California corporation; JOSEPH M. GAGE, an individual; and DOES 1 to 25, inclusive,

Defendants.

Case No.: 24STCV05341

DECLARATION OF DAVID HERRERIA TORRES IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF PAGA SETTLEMENT

Action filed: March 4, 2024
Hearing Date: April 2, 2027
Hearing Time: 10:00 a.m.
Hearing Dept: 50, Hon. Teresa A. Beaudet

Reservation ID: 006301682312

DECLARATION OF DAVID HERRERIA TORRES IN SUPPORT OF PAGA SETTLEMENT AND RELEASE

I, DAVID HERRERIA TORRES, declare and state as follows:

1. I am a resident of the State of California and am over 18 years of age. I am the named Plaintiff in this action and am represented by Maralle Messrelian of MM Law, APC in this action. Except as otherwise stated, I have personal knowledge of all matters set forth in this declaration and could and would competently testify thereto if called upon to do so as a witness.

2. I started working for Defendant JMG Specialties, Inc. ("JMG") as a welder in or around June/July 2021 at its facility located at 28620 Livingston Ave., Valencia, California. My employment with Defendant ended on or around November 4, 2023.

3. I understand that this lawsuit is a Private Attorney General action, otherwise known as a PAGA lawsuit. I understand that I am the Plaintiff and that JMG is the Defendant. I understand that my name is on the cover of the lawsuit. I understand that I am the representative of other JMG employees. As the representative in this lawsuit, I have duties to the State of California and other employees like me who were not paid for all hours worked at the correct rates of pay, provided all required meal and rest periods, and reimbursed for necessary business expenses, such as personal mobile phones for work purposes. I also understand that my lawsuit is on behalf of the State of California. I have fairly represented the other employees and the State throughout this lawsuit. I don't have any disagreements with the other JMG employees I represent. I am not aware of any reason why I can't make the best decisions for them in this lawsuit.

4. When I agreed to hire my attorneys to file this lawsuit, I also agreed that I would be the representative of the other employees and the State of California. I agreed that the interests of the other employees and the State in the lawsuit are as important as my personal interests in suing JMG. I agreed that I would do what is in the best interest of the other employees and the State when deciding whether or not to settle this lawsuit. I also agreed to actively participate in the lawsuit. I also understand that there will only be a settlement of the lawsuit if the Court allows it.

5. The PAGA statute does not forbid service awards. Courts frequently award them in PAGA-only cases as well. The work I have done on this case includes hiring my attorneys, speaking with my attorneys on many occasions by phone, explaining what my employment at

JMG was like, explaining what my employment at JMG had in common with other employees who worked for JMG, explaining my claims to my attorneys, and communicating with my attorneys about the settlement agreement and related documents. Despite this, I am **not** asking for a service award for my involvement and the time I spent assisting my counsel with the PAGA action.

6. I negotiated an individual settlement of my wage and hour claims after the Parties had agreed to the Settlement of the PAGA action.

7. As part of my individual settlement, I signed a general release of all claims, whether known or unknown, that I may have against Defendant, not only PAGA claims.

8. I don't believe that my individual settlement has any bearing on whether I have served the Aggrieved Employees' best interests and will continue to do so. Nevertheless, I am willing to provide it to the Court *in camera* if the Court so requests.

I declare under the penalty of perjury of the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed on November 2, 2026 at Santa Clarita, California.

David Herreria Torres (Nov 2, 2026 10:24:12 PST)

DAVID HERRERIA TORRES,
Declarant