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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA**

WILLIAM JOHNSON, individually, and on
behalf of other members of the general public
similarly situated; MANUEL TORRES-
GALSTER, individually, and on behalf of
other members of the general public similarly
situated and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act,

Plaintiffs,

vs.

AEROVIRONMENT, INC., a Delaware
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 2024CUOE022908

Honorable Charmaine H. Buehner
Department 44

CLASS ACTION

**DECLARATION OF WILLIAM
JOHNSON IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Hearing Date: July 1, 2026
Hearing Time: 1:30 p.m.
Department: 44

Complaint Filed: March 29, 2024
FAC Filed: February 20, 2026
Trial Date: None Set

DECLARATION OF WILLIAM JOHNSON

I, William Johnson, hereby declare as follows:

1. I am over 18 years of age and a resident of Texas. I am a named plaintiff in the above-captioned case and was the named plaintiff of the dismissed class action entitled *William Johnson v. AeroVironment, Inc.*, filed in in the Superior Court of the State of California, County of Los Angeles, Case No. 21STCV29231. 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 AeroVironment, Inc. ("Defendant") from approximately August 2017 to approximately October 2018 as an hourly-paid employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers for Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers for Justice, PC discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and a class representative. Prior to commencing the dismissed class action entitled *William Johnson v. AeroVironment, Inc.*, and joining the above-captioned case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid, non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. In addition, I assisted my attorneys in preparing responses to Defendant's Form

1 Interrogatories–Employment Law (Set One), Special Interrogatories (Set One), Requests for
2 Admission (Set One), and Requests for Production of Documents (Set One), and producing
3 responsive documents.

4 5. Throughout these matters, I was available to answer any questions my attorneys
5 had, and available to speak and meet with my attorneys whenever they needed me. I responded to
6 them as quickly as possible and gave them as much information and identified as many documents
7 as I could. I spent time speaking with my attorneys about the cases, identifying potential witnesses,
8 providing my attorneys with documents and information concerning the cases, and also describing
9 policies, practices, and procedures of Defendant.

10 6. As far as the settlement is concerned, I was available to review documents and
11 answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the
12 Settlement Agreement and discussed the questions I had regarding the potential settlement with my
13 attorneys before signing the settlement papers.

14 7. I understand that a settlement has been reached in my case and what my duties and
15 responsibilities are as a class. For example, I am aware that if the settlement is granted preliminary
16 approval, the Court will certify a class for settlement purposes, and likely appoint me as the
17 representative of the class and my attorneys as counsel for the class. I also understand that my
18 duties will include checking in on, monitoring, and conferring with my attorneys to facilitate the
19 notice and settlement administration process, and to provide information that the Court needs in
20 order to assess whether the settlement is fair, reasonable, and adequate. Further, if any individuals
21 who are potential class members contact me, I will take steps to have them referred to the Court-
22 appointed settlement administrator so that these individuals may receive the necessary information
23 and notice they may be eligible to receive in connection with the settlement and contemplated final
24 approval hearing.

25 8. I believe that I have done everything that my attorneys have asked of me and have
26 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class
27 members. I have volunteered to represent and champion the interests of many other people with
28 similar claims and injuries because of the importance of the cases and the necessity that all class

1 members benefit from the lawsuits equally. I understand that as a proposed class representative,
2 and if formally appointed as a class representative, I have and continue to represent the interests of
3 all members of the class in litigation to recover relief for the class. As an hourly-paid employee of
4 Defendant who was subject to the same policies, practices, and procedures as the other members of
5 the class, I have claims that are typical of those of the class. I consider the interests of the class just
6 as I would consider my own interests. I understand that I may need to put the interests of the class
7 before my own interests, although I have no reason to believe that my interests are in conflict with
8 the interests of the class. I understand that any resolution of the lawsuit is subject to court approval
9 and must be in the best interest of the class as a whole. I have participated, and continue to
10 participate, in the lawsuit as necessary. I have actively followed and monitored the progress of the
11 lawsuits, and have taken steps to make sure that the litigation is prosecuted by the skilled and
12 effective attorneys that I have retained.

13 9. I think my efforts helped to get the result obtained in these matter, and as a potential
14 class, I respectfully request that the Court award me an enhancement award for my efforts in
15 pursuing and participating in these matters, as well as my broader release of claims. Taking into
16 consideration the time that I have dedicated to these matters, I believe that this amount is
17 reasonable.

18 10. I am not related to anyone associated with Lawyers *for* Justice, PC.

19 11. I have not entered into any undisclosed agreements, nor have I received any
20 undisclosed compensation in these matters. The only compensation I will receive is whatever
21 amount the Court awards as an enhancement award, as well as my share of the settlement as a class
22 member.

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

25 Executed on this ____ day of 29/04/2026 2026, at Fort Worth, Texas.

26 
27 Electronically Signed 2026-04-29 08:02:43 UTC - 172.58.188.91
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28 William Johnson