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Attorneys for Plaintiffs

**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 MANUEL
TORRES-GALSTER 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

1 providing my attorneys with documents and information concerning the case, and also describing
2 policies, practices, and procedures of Defendant.

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

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

18 7. I believe that I have done everything that my attorneys have asked of me and have
19 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class
20 members and the State of California with respect to aggrieved employees. I have volunteered to
21 represent and champion the interests of many other people with similar claims and injuries because
22 of the importance of the case and the necessity that all class members and aggrieved employees
23 benefit from the lawsuit equally. I understand that as a proposed class representative, and if
24 formally appointed as a class representative, I have and continue to represent the interests of all
25 members of the class in litigation to recover relief for the class. As an hourly-paid employee of
26 Defendant who was subject to the same policies, practices, and procedures as the other members of
27 the class, I have claims that are typical of those of the class. I consider the interests of the class just
28 as I would consider my own interests. I understand that I may need to put the interests of the class

1 before my own interests, although I have no reason to believe that my interests are in conflict with
2 the interests of the class. I understand that any resolution of the lawsuit is subject to court approval
3 and must be in the best interest of the class as a whole. I have participated, and continue to
4 participate, in the lawsuit as necessary. I have actively followed and monitored the progress of the
5 lawsuit, and have taken steps to make sure that the litigation is prosecuted by the skilled and
6 effective attorneys that I have retained.

7 8. I think my efforts helped to get the result obtained in this matter, and as a potential
8 class and PAGA representative, I respectfully request that the Court award me an enhancement
9 award for my efforts in pursuing and participating in this matter, as well as my broader release of
10 claims. Taking into consideration the time that I have dedicated to this matter, I believe that this
11 amount is reasonable.

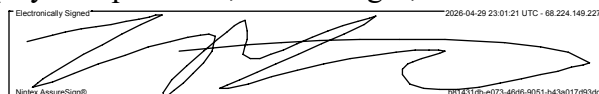
12 9. I am not related to anyone associated with Lawyers *for* Justice, PC.

13 10. I have not entered into any undisclosed agreements, nor have I received any
14 undisclosed compensation in this matter. The only compensation I will receive is whatever amount
15 the Court awards as an enhancement award, as well as my share of the settlement as a class
16 member and aggrieved employee.

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

04/29/2026

19 Executed on this ____ day of April 2026, at Las Vegas, Nevada.

20  2026-04-29 23:01:21 UTC - 68 224 149 227
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21 Manuel Torres-Galster