

KELLER GROVER LLP
1965 Market Street, San Francisco, CA 94103
Tel. 415.543.1305 | Fax 415.543.7861

ERIC A. GROVER (SBN 136080)
eagrover@kellergrover.com
ROBERT W. SPENCER (SBN 238491)
rspencer@kellergrover.com
KELLER GROVER LLP
1965 Market Street
San Francisco, California 94103
Telephone: (415) 543-1305
Facsimile: (415) 543-7861

Attorneys for Plaintiff
CRISTIAN PEREZ RUIZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA

CRISTIAN PEREZ RUIZ, on behalf of himself,
all others similarly situated, and all aggrieved
employees,

Plaintiff,

v.

BOISE CASCADE COMPANY; and DOES 1
through 10, inclusive,

Defendants.

Case No. 24CV069044

*Assigned for all purposes to the
Hon. Somnath Raj Chatterjee*

CLASS ACTION

**DECLARATION OF CRISTIAN PEREZ
RUIZ IN SUPPORT OF MOTION FOR
FINAL APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT AND MOTION
FOR AWARD OF REASONABLE
ATTORNEYS’ FEES AND COSTS, CLASS
REPRESENTATIVE INCENTIVE
AWARD/GENERAL RELEASE PAYMENT,
AND SETTLEMENT ADMINISTRATION
FEES**

Date: November 18, 2025

Time: 2:30 p.m.

Dept: 21

Complaint filed: March 25, 2024

Trial Date: TBD

Reservation No. 999846881826

Reservation No. 236127152205

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1 I, CRISTIAN PEREZ RUIZ, declare as follows:

2 1. I am the named Plaintiff and Class and PAGA representative in this action against
 3 Boise Cascade Company (“Boise”). I submit this Declaration in support of the Plaintiff’s Motion
 4 for Preliminary Approval of Class and PAGA Settlement and Motion for Award of Reasonable
 5 Attorneys’ Fees and Costs, Class Representative Incentive Award/General Release Payment, and
 6 Settlement Administration Costs. I am a competent adult, I have personal knowledge of the facts
 7 set forth in this declaration, and I could and would testify competently under oath if called as a
 8 witness.

9 2. I worked for Boise as a non-exempt employee from approximately August 2023
 10 through January 2024 at Boise’s facility in Lathrop, California.

11 3. It is my understanding that when calculating my regular rate and overtime rate, the
 12 regular rate is supposed to take into account not only my base hourly wages but also all
 13 nondiscretionary payments for work I performed, like non-discretionary payments for filling out
 14 “Radar” safety reports. When calculating my regular rate for premium pay, Boise did not take
 15 into account any nondiscretionary payments for filling out Radar reports, leading to an incorrect
 16 and lower rate of pay for my overtime rate. I also believed it was wrong for Boise to fail to
 17 provide me all of my meal and rest breaks, and to reimburse me for all of my business expenses.

18 4. When I decided to bring this action, I first spoke with my attorney Robert Spencer,
 19 Esq. of Keller Grover LLP. We discussed Keller Grover LLP’s extensive experience litigating
 20 employment cases. I spent over an hour and a half describing to him the facts of my case. We
 21 also discussed in-depth the process of class action litigation as well as my responsibilities as a
 22 class representative. We also discussed that the case would be brought as a “PAGA”
 23 representative action under the Labor Code Private Attorneys’ General Act of 2004, Labor Code
 24 §§ 2698, *et seq.*

25 5. I also spent several days searching for documents that would aid my attorneys in
 26 this case. After I found these documents, I had additional telephone calls with Mr. Spencer to
 27 discuss them and how they affect the case.
 28

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6. Prior to filing the complaint, I spent an hour with Mr. Spencer working on the PAGA exhaustion letter that was sent to the State of California. I understand that I was required to send this letter to the State of California in order to bring the PAGA causes of action. I also spent approximately 30 minutes reviewing the PAGA letter to make sure it was accurate.

7. My attorneys filed the Complaint on March 25, 2024 and I reviewed it with Mr. Spencer and spent approximately an hour reviewing the complaint prior to it to being filed.

8. Mr. Spencer let me know that Defendant was willing to mediate this action and we discussed what that meant. The mediation took place on February 5, 2025. Prior to the mediation, I had numerous telephone calls with Mr. Spencer to respond to questions that he had. I also made sure that I was available on the date of the mediation.

9. When the formal settlement was ready, I spent half an hour speaking with Mr. Spencer regarding the settlement, whether it was fair, and the plan of distribution. I also spent two hours reviewing the settlement agreement before I signed it.

10. Throughout this litigation, I have had regular telephone conversations with Mr. Spencer regarding this case, we speak about once a month. I often telephone Mr. Spencer to see how the case is going and ask whether there is anything that I need to do. I also receive regular telephone calls from Mr. Spencer updating me on the progress of the case.

11. When I agreed to act as a named plaintiff/Class Representative, I understood that I might be responsible for some of the costs incurred by Defendant if the lawsuit was unsuccessful. In addition to this, I worried about my reputation in the community if people were to find out I had sued somebody.

12. I also am concerned about the possible repercussions to my future job opportunities because I have been a plaintiff in a class action wage and hour lawsuit against an employer.

13. I understood from the beginning that I was pursuing this case not only for my own benefit, but for the benefit of large numbers of past and present employees who either were not aware of their rights or were too afraid of retaliation to complain.

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14. I believe that the settlement reached in this case is fair and, in light of the risks involved, will justly compensate the employees who were and are affected by the violations that were the subject of the action.

15. I believe that my proposed incentive award that I have requested is fair in light of all the work I did in this case against Boise. I further believe my proposed incentive award is fair considering the work I put into the case, the risks I took, the harm that I believe my suing my employer could cause me in terms of future job prospects, and the benefits that have been achieved for the class members. I have also given a general release of my claims.

16. I understand that as a class and PAGA representative I have to be a champion of the causes of many other people with similar claims as my own. I know that this action is brought on behalf of a group of employees referred to as a class. I am aware that the proposed class has to be approved by the Court, and I am the representative of the class. I also understand that as a PAGA representative, I am bringing an enforcement action on behalf of California seeking statutory penalties on behalf of myself and other aggrieved employees.

17. As a proposed class and PAGA representative, I am fully aware that this means that I have responsibilities to the class and the aggrieved employees. I know that I am a fiduciary of the class and the aggrieved employees. This means that I have to look out for the best interest of the class and the aggrieved employees. I have a responsibility to consider the interest of the class and the aggrieved employees just as I would consider my own interest, even if that means that I must put their interests before my own.

18. I know that I have to actively participate in the lawsuit, which I have done. I have worked with my attorneys throughout this lawsuit and am always available to answer their questions. I would have also testified if need be as well as attend trial.

19. I also know that it is my duty to cooperate fully in this action and be forthright with both the attorneys and the Court by being truthful and providing all of the facts, both good and bad, when asked.

20. I am aware that the Court has to approve the settlement in this lawsuit because it is both a proposed class action and a PAGA action. I have reviewed and approved the settlement

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and I believe that it is fair and will justly compensate the class and the aggrieved employees.

21. I have no interest or involvement with the settlement administrator Phoenix Settlement Administrator.

22. I also have no interest or involvement in the governance or work of the proposed cy pres recipient, Legal Aid at Work.

23. I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct, and that this Declaration was executed on this 10/18/2025 (insert date) at Riverbank, California.

Cristian Perez Ruiz
 CRISTIAN PEREZ RUIZ

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PROOF OF SERVICE

I, JOEY GONZALEZ, am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1965 Market Street, San Francisco, California 94103. On **October 23, 2025** in the case of *Ruiz v. Boise Cascade Company*, Alameda County Superior Court Case Number 24CV069044, I served the foregoing document(s):

DECLARATION OF CRISTIAN PEREZ RUIZ IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT AND MOTION FOR AWARD OF REASONABLE ATTORNEYS' FEES AND COSTS, CLASS REPRESENTATIVE INCENTIVE AWARD/GENERAL RELEASE PAYMENT, AND SETTLEMENT ADMINISTRATION FEES

on the interested party(ies) below, using the following means:

Angela Rafter, Esq.
arafter@littler.com
Benjamin Sanchez, Esq.
bsanchez@littler.com
Timothy Anderson
tanderson@littler.com
Monique Kenner
mkenner@littler.com
Charisse Goodman,
chgoodman@littler.com
LITLER MENDELSON P.C.
Treat Towers
1255 Treat Blvd, Suite 600
Walnut Creek, CA 94597
Telephone: (925) 932-2468
Facsimile: (925) 946-9809

Attorneys for Defendant
BOISE CASCADE COMPANY

☒	(BY ELECTRONIC SERVICE) by electronically mailing a true and correct copy in PDF format through our electronic mail system to the email address(es) set forth above, or as stated on the attached service list per agreement between the parties
☒	(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.



JOEY GONZALEZ