

ELECTRONICALLY FILED
Superior Court of California,
County of Alameda
12/22/2025 at 02:03:49 PM
By: Shabira Iyamu,
Deputy Clerk

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

DONTE BOOZE, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

AIR LIQUIDE ADVANCED
MATERIALS, INC., a Delaware
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 24CV060686

**DECLARATION OF DONTE BOOZE
IN SUPPORT OF PLAINTIFF’S
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: January 15, 2026
Time: 3:00 p.m.
Department: 18

Reservation ID: 318479431349

DONTE BOOZE, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

AIR LIQUIDE ADVANCED
MATERIALS, INC., a Delaware
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Complaint Filed: January 19, 2024

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Attorneys for Plaintiff and the Class

DECLARATION OF DONTÉ BOOZE

I, Donte Booze, declare as follows:

1. I am an individual over the age of 18. I am a plaintiff in the above-referenced action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I was employed by Defendant Air Liquide Advanced Materials, Inc. (“Defendant”) as a non-exempt employee from about February 20, 2023, to about December 13, 2023.

3. During my employment, I routinely earned shift differential wages, which provided an additional non-discretionary incentive pay based on the shift I worked on.

4. During some of the work weeks that I earned shift differential wages, I also was paid sick pay and/or meal/rest break premiums due to not being able to take my meal/rest breaks in an appropriate manner. However, when I was paid sick pay or meal/rest break premiums, such payments were paid at my base rate of pay, rather than my regular rate of pay as such payments did not include my shift differential wages.

5. Lastly, the wage statements I received from Defendant were not compliant with the law. Specifically, whenever I worked overtime, the wage statements inaccurately identified the total hours worked.

6. During the pendency of this lawsuit, I have done my best to represent the interests of the employees that are part of the class. I have actively contributed to the litigation of this case. My contributions include but are not limited to (i) participating in numerous telephonic meetings with my attorneys and their staff to discuss the case and review documents prepared on my behalf, (ii) providing my attorneys with information and documents regarding my employment with Defendant, (iii) searching for additional information and documents requested by my attorneys, (iv) reviewing and approving the written notice to the Labor and Workforce Development Agency and the complaint and other papers filed with the court, (v) participating in mediation, (vi) reviewing and executing the settlement agreement, and (vii) reviewing and signing the declarations submitted to this Court in support of the settlement. I estimate I have

spent approximately 35 hours total in progressing the litigation on behalf of the Class.

7. I understand that the class claims alleged in this action were brought on behalf of other similarly situated employees, and thus I am acting as a representative for the Class. I understood that an individual case would have resolved much faster than a class action and involved much less financial risk than a class action.

8. Throughout the lawsuit, I have been kept apprised of the status of this case. As the class representative, I understand that it is my responsibility to act in the Class's best interests and not my own. I agree that I will not put my own interests ahead of that of the Class. Moreover, I am not aware of any conflicts that exist between my interest and the interests of the Class that would impair or affect my ability to serve as representative for the Class.

9. I have discussed the terms of the settlement agreement with my attorneys, and based on my understanding of the case, I am of the opinion that settlement for the consideration and on the terms set forth in the settlement agreement are fair, reasonable, and adequate, and in the best interests of the Class.

10. I understood that filing this lawsuit is a public record and I accepted that burden. This lawsuit is something that potential employers can look into, and which may cause a negative impact of my employment prospects. I also understood that there were risks due to my involvement as a named plaintiff in a representative lawsuit against a large employer. For instance, if I lost, I might have to face a judgment for some of Defendant's legal costs. Even understating all these risks, I was willing to move forward and bring this case on behalf of the other employees.

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

Executed on 12/19/2025, at Martinez, California.

Signed by:

Donte Booze

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Donte Booze