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Attorneys for Plaintiffs CALVIN PAYNE and JOHNY WILLIAMS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

CALVIN PAYNE and JOHNNY WILLIAMS, individually and on behalf of others similarly situated, and on behalf of Aggrieved Employees pursuant to the California Private Attorneys General Act,

Plaintiffs,

vs.

PDM STEEL SERVICE CENTERS, INC.; and DOES 1 through 25, inclusive,

Defendant.

Case No.: 24STCV00942
[related to Case No. 24STCV07204]

Assigned to the Honorable Carolyn B. Kuhl, Dept. SSC-12

DECLARATION OF PLAINTIFF CALVIN PAYNE IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Date:
Time:
Dept: SSC-12

Complaint Filed: January 12, 2024
FAC Filed: June 23, 2026
Trial Date: Not Set

DECLARATION OF CALVIN PAYNE

I, Calvin Payne, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am one of the named plaintiffs in the above-captioned case. 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 Defendant PDM Steel Service Centers, Inc. ("Defendant") as an hourly-paid, non-exempt machinery maintenance helper from approximately August 2018 to approximately March 2023.

3. Believing that Defendant's practices may not have been lawful, I sought legal advice regarding my work experiences and the possibility of filing a lawsuit. I contacted Blackstone Law, APC and consulted with its attorneys about Defendant's failure to properly compensate its employees for all hours worked and its non-compliant meal and rest break practices. I wanted to hold Defendant accountable for those violations. Following those initial consultations, I independently researched class and representative action lawsuits. I then further consulted with the attorneys at Blackstone Law, APC regarding my situation, the nature of class actions, representative actions under the Private Attorneys General Act ("PAGA"), and the implications of bringing such claims, so that I could make an informed decision about how to proceed.

4. I have regularly conferred with my attorneys regarding the case as part of my responsibilities as a class and PAGA representative. This process included searching for and providing documents concerning my employment with Defendant, answering any questions my attorneys had about the documents, providing information regarding the company's practices and the duties of other hourly-paid and/or non-exempt employees, and helping my attorneys develop a strategy as to what additional documents and information they could seek to obtain from Defendant.

5. Throughout the pendency of this action, I regularly communicated with my attorneys and their staff at Blackstone Law, APC to ensure they had my most current contact information and any additional information I had obtained regarding Defendant PDM Steel Service Centers, Inc.'s practices. I made myself available to answer their questions about Defendant's treatment of its hourly-

paid, non-exempt employees whenever needed and responded as promptly and thoroughly as possible.

6. I understood that in the event this matter did not settle and proceeded with trial, I would need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any responsibilities that are necessary for this lawsuit.

7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I also understood there was a risk of losing any job and/or income due to the time that I would have to spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. In contrast, the other employees who will be receiving money from this lawsuit did not have to file a claim or take the risk that I took in bringing this action.

8. I reviewed the settlement agreement, discussed the settlement agreement with my attorneys, and asked them questions before signing it.

9. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California. I have spent approximately 45-50 hours participating in this case as described above. I believe my efforts helped get the result obtained in this case.

10. I understand that any resolution of this lawsuit on a class wide basis is subject to court approval, and any settlement must be designed in the best interest of the Class as a whole. At all times throughout the course of this litigation, I have considered the interests of the Class and put them before my own personal interests.

11. I understand that incentive or enhancement awards are discretionary and intended to compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA action, and an acknowledgment of the benefits resulting from the representative's actions. I believe my work in this matter is meritorious on these points for the reasons set forth above.

12. I respectfully request that the Court approve and award me an Enhancement Payment in the amount of $10,000 for my efforts and active participation in this case and for the broader, general release of all claims I have or may have against Defendant PDM Steel Service Centers, Inc. in

connection with this settlement. Taking into consideration the time I dedicated to this matter, I believe this amount is reasonable.

13. I am not related to anyone associated with Blackstone Law, APC.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 9-18-26, at Stockton, California.

Calvin Payne

Calvin Payne