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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CARLOS ZAVALA and GONZALO
MARTINEZ, as individuals and on behalf of all
other aggrieved employees,

Plaintiffs,

vs.

PASO ROBLES TANK, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 24STCV03493

*[Assigned for all purposes to the Hon.
Timothy Patrick Dillon, Dept. SSC-15]*

**DECLARATION OF CARLOS ZAVALA
IN SUPPORT OF PLAINTIFFS'
MOTION FOR APPROVAL OF
SETTLEMENT OF CLAIMS BROUGHT
UNDER THE PRIVATE ATTORNEYS'
GENERAL ACT**

Date: April 30, 2025
Time: 10:00 a.m.
Dept.: SSC-15

Complaint filed: February 9, 2024
Trial Date: None Set

I, Carlos Zavala, declare as follows:

2. I was employed by PRT as a non-exempt employee in the position of “Welder” from approximately 2020 through approximately December 2023.

4. During my employment with PRT, I often did not always receive a meal period until after the end of my fifth hour of work and my meal periods were often less than a full 30 minutes due to work demands. I was also not provided with a second meal period when I worked more than ten (10) hours in a shift. I also was not always able to take my off-duty rest periods due to the work demands imposed by PRT. In addition, PRT did not reimburse my business expenses when I used my personal cellular phone, vehicle, and tools for business purposes. As a result of these violations, it is my understanding that PRT did not issue accurate wage statements. As a further result of the violations, it is my understanding that PRT failed to pay all wages owed to me at my time of separation of employment with PRT.

5. When I filed this lawsuit, I understood that it could benefit my former coworkers, other PRT employees, and the State of California by helping to recover penalties on their behalf

1 as a result of the alleged violations described above. I also understood that I was filing this case
2 as an “aggrieved employee” on behalf of myself and my fellow “aggrieved employees” as well
3 as the State of California.

4 6. When I filed this lawsuit, I knew there was a risk I could be liable for PRT’s costs
5 if we lost the case. I also understood that filing a lawsuit is a public record. However, I accepted
6 those risks so that I could help recover penalties on behalf of other PRT employees and the State
7 of California. Even though I assumed these risks, to date, I have not suffered any actual adverse
8 consequences because I filed this lawsuit.

9 7. I have been actively involved in this case since it started in 2024. Without waiving
10 the attorney-client privilege, I have had many phone conversations and meetings with my
11 attorneys throughout this case to discuss PRT’s wage and hour policies and practices, identify
12 potential witnesses, and discuss case strategy. I also gathered and reviewed documents for use in
13 the lawsuit and reviewed relevant documents with my attorneys and made myself available during
14 mediation. I estimate that I have spent approximately 45-50 hours performing these activities in
15 order to help the case.

16 8. I understand that my attorneys will request that the Court approve an enhancement
17 payment of \$5,000.00 for my efforts on behalf of the aggrieved employees and the State of
18 California. I believe this amount is reasonable based on the amount of time and effort I have
19 devoted to this case and the risks I have undertaken as a representative. My support for the
20 Settlement is not contingent on me receiving this enhancement payment

21 I declare under penalty of perjury under the laws of the State of California and the United
22 States that the foregoing is true and correct. Executed on March 9, 2026
23 at Downey, California.

24 Carlos E. Zavala Aquino

25 Carlos E. Zavala Aquino (Mar 9, 2026 18:27:20 PDT)

26 Carlos Zavala