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Attorneys for Plaintiff STEVE ROBLES,
individually, and on behalf of aggrieved employees
pursuant to the California Private Attorneys General
Act

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

STEVE ROBLES, individually, and on
behalf of aggrieved employees pursuant to
the California Private Attorneys General
Act,

Plaintiff,

vs.

AVERY PRODUCTS CORPORATION, a
Delaware Corporation; and DOES 1 through
25, inclusive,

Defendants.

Case No.: 30-2024-01390483-CU-OE-CXC

Honorable Melissa R. McCormick
Department CX105

**DECLARATION OF PLAINTIFF
STEVE ROBLES IN SUPPORT OF
MOTION FOR APPROVAL OF PAGA
SETTLEMENT AND AWARD OF PAGA
COUNSEL FEES AND LITIGATION
EXPENSES PAYMENT AND
ADMINISTRATION EXPENSES
PAYMENT**

Reservation ID: 74724919
Date: January 29, 2026
Time: 2:00 p.m.
Dept: CX105

Complaint Filed: April 2, 2024
FAC Filed: January 13, 2025
SAC Filed: October 9, 2025
Trial Date: Not Set

DECLARATION OF STEVE ROBLES

I, Steve Robles, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am the named plaintiff 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 Avery Products Corporation (“Defendant”) as an hourly-paid, non-exempt Client Service Employee from approximately October 2022 to approximately May 2023.

3. Because I thought the practices at Defendant may not be lawful, I decided to seek legal advice about my work experiences at Defendant and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps to make sure Defendant was held accountable for not properly compensating its employees for all hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits under the Private Attorneys General Act (“PAGA”), and what it meant to bring a class and PAGA action so that I understood what I was considering doing.

4. I have regularly conferred with my attorneys regarding the case as part of my responsibilities as a 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. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained. I made myself available to answer any questions my attorneys had about Defendant’s practices and treatment of its employees whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could.

6. 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 Aggrieved Employees and the State of California. I believe my efforts helped get the result obtained in this case.

7. I reviewed the settlement agreement, discussed the settlement agreement with my attorneys, and asked them questions before signing it. I also executed a separate agreement to settle and resolve my individual claims with Defendant.

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

9. 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 11/13/2025, at La Puente, California.

Steve Robles

Steve Robles