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Attorneys for Defendant
U.S. PRECISION SHEET METAL, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE

MONICA OJEDA, individually, and on behalf
of all others similarly situated,

Plaintiff,

v.

U.S. PRECISION SHEET METAL, INC., a
California corporation; and DOES 1 through
10, inclusive,

Defendants.

Case No. CVRI2401083

**DECLARATION OF KEVIN ABBOTT
IN SUPPORT OF MOTION FOR
PRELIMINARY SETTLEMENT
APPROVAL**

Action filed: Feb. 28, 2024

DECLARATION OF KEVIN ABBOTT

I, Kevin J. Abbott, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am an attorney of Fennemore LLP, attorneys of record for Defendant U.S. PRECISION SHEET METAL, INC. (“Defendant”). I have personal knowledge of the facts set forth herein, except as to those stated on information and belief and, as to those, I am informed and believe them to be true. If called as a witness, I could and would competently testify to the matters stated herein.

2. I am aware of one class, representative or other collective action in another court in this or any other jurisdiction that asserts claims similar to those asserted in this action on behalf of a class or group of individuals, some or all of whom would also be members of the class defined in this action. The name and case number of this case is: JORGE ALEMAN BUSTOS, individually and on behalf of all others similarly situated, vs. U.S. PRECISION SHEET METAL, INC., Riverside Case No. CVRI2500958 (“Bustos Action”).

3. The plaintiff in the Bustos Action asserts the following claims:

- (a) Failure to Pay Minimum Wages;
- (b) Failure to Pay Overtime Wages;
- (c) Failure to Provide Meal Periods;
- (d) Failure to Permit Rest Breaks;
- (e) Failure to Reimburse Business Expenses;
- (f) Failure to Provide Accurate Itemized Wage Statements;
- (g) Failure to Pay All Wages Due Upon Separation of Employment;
- (h) Violation of Business and Professions Code §§ 17200, et seq.; and
- (i) Enforcement of Labor Code § 2698 et seq. (“PAGA”)

4. The proposed class in the Bustos Action is defined as follows: “All persons currently or formerly employed by any or all Defendants as non-exempt employees in the State of California at any time between February 13, 2021 and the date of class certification.”

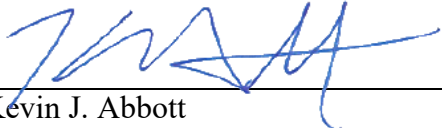
1 5. The plaintiff in the Bustos Action also seeks to certify the following subclass: "All
2 members of the Class who separated their employment with any or all Defendants at any time
3 between February 13, 2022 and the date of class certification."

4 6. The Bustos Action complaint does not define a subset of employees for its PAGA
5 claim.

6 7. As for procedural history of the Bustos Action, Defendant has filed an answer. A
7 case management conference is scheduled for December 1, 2025.

8 8. My understanding is that the proposed recipient of uncashed settlement payments is
9 Legal Aid at Work. Neither my firm, nor any attorney at my firm, nor my client have a relationship
10 with Legal Aid at Work. I inquired via email to confirm the lack of any such relationship, and have
11 received no indication that any such relationship exists.

12 I declare under penalty of perjury under the laws of the State of California that the foregoing
13 is true and correct. Executed on July 30, 2025 in Corona, California.

14
15 
16 Kevin J. Abbott