

Larry W. Lee (State Bar No. 228175)
lwlee@diversitylaw.com
Mai Tulyathan (State Bar No. 316704)
ktulyathan@diversitylaw.com
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa St., Suite 1250
Los Angeles, California 90071
(213) 488-6555
(213) 488-6554 facsimile

William L. Marder (SBN 170131)
bill@polarislawgroup.com
POLARIS LAW GROUP
501 San Benito Street, Suite 200
Hollister, CA 95023
Telephone: (831) 531-4214
Facsimile: (831) 634-0333

Attorneys for Plaintiff Ramiro Penaloza Jr.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN**

RAMIRO PENALOZA JR. and PETER
FERRY, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

WWS ACQUISITION LLC., a Missouri
Limited Liability Company; and DOES 1
through 50, inclusive,

Defendants.

Case No.: STK-CV-UOE-2024-0004594

(Assigned to the Honorable Esmeralda Zendejas,
Dept. 11A)

**DECLARATION OF RAMIRO PENALOZA
JR. IN SUPPORT OF PLAINTIFF'S
MOTION TO APPROVE SETTLEMENT
PURSUANT TO THE PRIVATE
ATTORNEYS GENERAL ACT**

Date: October 7, 8, 10, 15 or 17, 2025

Time: 9:00 a.m.

Dept.: 11A

Action Filed: April 15, 2024

Trial Date: None Set

I, Ramiro Penaloza Jr., declare under penalty of perjury as follows:

1. I am an individual over the age of 18. I am one of the named Plaintiffs 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. This declaration is submitted in support of Plaintiffs' Motion to Approve the Settlement Pursuant to the Private Attorneys General Act.

3. I was hired by Defendant WWS Acquisition, LLC ("Defendant") as a Fabricator, in or around June 26, 2023. On or about April 5, 2024, my employment with Defendant ended. Throughout my employment, I was paid as an hourly, non-exempt employee.

4. During my employment, I regularly worked overtime and was paid overtime wages. However, during periods when I was paid overtime, I was issued inaccurate wage statements.

5. I understand that this action was brought on behalf of the State of California as a private attorney general. I understand that this action was brought on a representative basis on behalf of other aggrieved employees of Defendant. I do not have any interests that are adverse to the other employees that are part of the PAGA settlement.

6. I have spent a significant amount of time discussing this matter with my attorneys on many occasions and explaining my understanding of Defendant's practices. To date, I have performed a number of tasks in my role as the representative. This includes discussing this case and the facts involved with my attorneys; searching for and providing documents pertaining to the case; reviewing the files and pleadings, including my paystubs/payroll documents, the PAGA letter, the complaint, and the Settlement Agreement; responding to any questions from my attorneys regarding Defendant's practices; and regularly providing information to my attorneys. In total, I estimate that I have spent roughly 30 hours in connection with the prosecution of this lawsuit.

7. I have discussed the terms of the Settlement Agreement with my attorneys, and I believe that the settlement is fair, adequate and reasonable for all other employees who worked for Defendant.

8. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive accomplishment and understand that other people and the State of California will benefit because of

the actions that I have taken.

9. Additionally, I am executing a general release of any and all claims, including any rights I would have had under Civil Code § 1542, which was not required of other Aggrieved Employees.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 22, 2025, at Fresno, California.

Signed by:

Ramiro Alexis Penalosa

Ramiro Penalosa Jr.