

Jonathan M. Genish (State Bar No. 259031)
Barbara DuVan-Clarke (State Bar No. 259268)
BDC@blackstonepc.com
Danielle GruppChang (State Bar No. 313881)
dgruppchang@blackstonepc.com
P.J. Van Ert (State Bar No. 234858)
pjvanert@blackstonepc.com
Annabel F. Blanchard (State Bar No. 258135)
ablanchard@blackstonepc.com
BLACKSTONE LAW, APC
8383 Wilshire Boulevard, Suite 745
Beverly Hills, California 90211
Tel: (310) 622-4278 / Fax: (855) 786-6356

Attorneys for Plaintiff DANIEL MUNGUIA,
individually, and on behalf of other similarly
situated employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES-SPRING STREET COURTHOUSE

DANIEL MUNGUIA, individually, and on
behalf of other similarly situated employees
and aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

vs.

MOOG INC.; and DOES 1 through 25,
inclusive,

Defendants.

Case No.: 24STCV11688
[related to Case No. 24STCV17560]

Honorable William F. Highberger
Department 10

**DECLARATION OF PLAINTIFF
DANIEL MUNGUIA IN SUPPORT OF
MOTION FOR APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date:
Time:
Dept: 10

Complaint Filed: May 8, 2024
FAC Filed: August 22, 2025
Trial Date: Not Set

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

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

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

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

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

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

25 12. I respectfully request that the Court approve and award me a Class Representative
26 Service Payment in the amount of \$10,000.00 for my efforts and active participation in the case and
27 for the broader, general release of all claims that I have or may have against Defendant in connection
28 with the settlement. Taking into consideration the time that I dedicated to this case, I believe that this

1 amount is reasonable.

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

3 I declare under penalty of perjury under the laws of the State of California that the foregoing
4 is true and correct. Executed on 09/11/2025, at Los Angeles, California.

5 *Daniel Munguia*
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