

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Fletcher W. Schmidt (SBN 286462)
fschmidt@haineslawgroup.com
Matthew K. Moen (SBN 305956)
mmoen@haineslawgroup.com
Ian T. Mallery (SBN 359132)
imallery@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355
Attorneys for Plaintiff

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

VICENTE SANDOVAL, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

CYBEX SECURITY SOLUTIONS, LLC, a
California Limited Liability Company;
SONITROL ORANGE COUNTY, LLC, a
California Limited Liability Company; and
DOES 1 through 100,

Defendants.

Case No. 30-2024-01398109-CU-OE-CXC

*[Assigned for all purposes to the Hon. Layne
H. Melzer, Dept. CX102]*

**DECLARATION OF VICENTE
SANDOVAL IN SUPPORT OF
APPROVAL OF CLASS ACTION AND
PAGA ACTION SETTLEMENT**

Date: September 11, 2025

Time: 2:00 p.m.

Dept.: CX102

Reservation ID No.: 74579556

Action Filed: May 8, 2024

Trial Date: None Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

I, Vicente Sandoval, declare as follows:

1. I am an individual over the age of 18 and am the named Plaintiff in this matter.

This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I have worked for Defendants Cybex Security Solutions, LLC (“Cybex”), and Sonitrol Orange County, LLC (“Sonitrol”) (together, “Defendants”), in California from approximately November 5, 2019 through the present. During this time, I have held the job title of “Lead Technician.” Due to production demands, I was often required to clock out for meal periods to make it appear as if I received a meal period, but was required to continue working while off the clock. I would then receive a meal period beginning after my fifth hour of work, which was often short or interrupted. When I worked long shifts over 10 hours I did not get to take a second meal period. This issue extended to my 10-minute rest periods as well because I was regularly required to combine my rest period with my meal period. I was also required to carry my cell phone with me and respond to calls and texts while on my rest period. I do not believe I received any extra pay for not receiving all of my meal or rest periods during my employment. While Defendants issued me a company cell phone, it was frequently unusable, and I was required to download applications and communicate with supervisors using my personal cell phone. I was also required to purchase and use my own tools necessary to do my work duties, such as a hammer drill, EMT conduit bender, and a knockout set. Despite making these purchases, I was never reimbursed for the expenses. I was also not paid for the time I spent traveling to the initial worksite each day after receiving my job assignment at Defendants’ main facility. Because of these issues, I believe Defendants did not issue me accurate wage statements.

3. I started this lawsuit against Defendants because I wanted Defendants to comply with the law and treat their employees fairly. I feel that I have taken on a greater burden than any of the other Cybex and Sonitrol employees because I have been actively involved in the litigation, and because it is my name that is attached to the lawsuit. Even though I understood that this

lawsuit would be a public record, I accepted that burden for the benefit of Defendants' other workers.

4. I have been actively involved in this case since before it was filed. Some of the tasks I have performed include gathering and reviewing relevant policy documents and pay statements for use in the lawsuit, providing factual information about Defendants' policies and practices, and helping identify other employees who also experienced the same issues that I did. I also greatly assisted my attorneys in preparing for mediation, including providing key evidence used by my attorneys during mediation, and made myself available the entire day of mediation to answer my attorneys' and the mediator's questions. I estimate that I have spent at least 15-20 total hours on these activities.

I declare under penalty of perjury under the laws of the state of California and the United States that the foregoing is true and correct. Executed on May 19, 2025, in North Hills, California.


Vicente Sandoval (May 19, 2025 15:36 PDT)
Vicente Sandoval