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*Attorneys for Plaintiffs Abram Izquierdo-Duarte,
Rolando de Luna, and Brenda Barragan*

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

CARLOS MARQUEZ, ABRAM IZQUIERDO-
DUARTE, ROLANDO DE LUNA, and
BRENDA BARRAGAN, individually, on behalf
of all others similarly situated, and on behalf of
the State of California and other aggrieved
persons,

Plaintiffs,

v.

NAVAL ENGINEERING SUPPORT INC., a
California corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No. 37-2024-00023814-CU-OE-CTL
[Consolidated With Case No. 37-2024-
00028311-CU-OE-CTL]

*Hon. Katherine A. Bacal
Dept. 63*

CLASS ACTION

**DECLARATION OF CLASS
REPRESENTATIVE ROLANDO DE LUNA**

Motion for Final Approval Hearing:

Date: February 20, 2026

Time: 1:30 p.m.

Action Filed: May 22, 2024

1 I, Rolando de Luna, declare as follows:

2 1. I am over 18 years of age and am a named plaintiff in this lawsuit. I am familiar with
3 and have personal knowledge of the facts set forth in this declaration.

4 2. I submit this declaration in support of the Motion for Final Approval of Class Action
5 Settlement filed in my case. If called as a witness, I would competently testify honestly to the below
6 facts based on my personal knowledge.

7 3. From July 2023 through April 2024, I was employed by NAVAL ENGINEERING
8 SUPPORT INC. (“Defendant” or “Naval Engineering”) as a Deck Installer. I was paid as an hourly
9 wage employee.

10 4. During my employment, I became familiar with Naval Engineering’s employment
11 practices, which led me to identify payment issues that I alleged in the complaints filed by my lawyers
12 with the Court.

13 5. As a result, I searched for an employment lawyer to take legal action on behalf of
14 myself and my coworkers.

15 6. My intent was to find a lawyer to correct some of the payment and timekeeping
16 practices occurring at Naval Engineering.

17 7. I came across Ferraro Vega Employment Lawyers. Mr. Ferraro, Ms. Vega, and their
18 law firm agreed to take my case and move forward on a class action basis. They accepted my case on
19 a contingency fee basis.

20 8. Prior to filing the case, I spoke at length with my attorneys and their staff, provided
21 documents and records in my possession, signed authorizations so that my attorneys could request
22 additional employment and payroll records, and provided my attorneys with contacts and witnesses to
23 speak to.

24 9. Before we filed the case, my lawyers conducted significant investigation—reviewing
25 my employment and payroll records and going over in detail specific examples of wrongful conduct I
26 alleged in the complaints.

27 10. I filed the consolidated lawsuit on June 17, 2024 and have stayed involved since then
28 by reviewing policies and documents, emailing, texting, and calling my lawyers, and responding to

1 their questions as needed.

2 11. I enjoyed working with my legal counsel and am satisfied that we were able to come
3 to a resolution.

4 12. My lawyers advised me when I filed the case that it could take a long time and that I
5 would be better off individually bringing and settling my own individual action, but I elected to go
6 with the class action option because it allowed for relief, recovery, and change to policies and practices
7 in a way that an individual lawsuit alone probably could not have accomplished.

8 13. I think that the total settlement of \$250,000.00, where individuals are going to passively
9 receive compensation, is significant. It is something I am proud of. I am aware that the case was the
10 catalyst for recovery to class members.

11 14. Although I am proud to have my name on this lawsuit for the benefit of my coworkers,
12 this lawsuit has caused difficulty and stress in my personal and professional life. For example, the
13 public nature of this lawsuit—and potential employers' potential misconception of the lawsuit—
14 caused me concern with how it might affect my employment prospects.

15 15. When I decided to file the lawsuit, I was aware that this action is public record. I
16 understood that the lawsuit could continue for several years and would require my participation,
17 attention, and determination the entire time. I was made aware that I could become responsible for
18 some or all of my former employer's legal costs if the case did not conclude successfully (though my
19 lawyers advised me this risk was ultimately low because I was bringing the claims based on strong
20 facts and in good faith). Despite these risks, I decided to serve as a proposed class representative and
21 the named plaintiff.

22 16. Even though my lawyers tell me I likely could have a settlement on an individual basis,
23 this would not have been fair to my coworkers. After more than a year of litigation, I feel good about
24 seeing the case through and bringing it to a final close.

25 17. I spent many hours working on my case before and after it was filed. I provided my
26 attorneys with information related to Naval Engineering's policies and practices. I gathered
27 documents related to my case and reviewed the documents provided by Naval Engineering in
28 discovery and in advance of mediation. I provided information that would have been used in my

1 discovery responses. I reviewed information and documents produced by Naval Engineering, helped
2 with my declaration in support of this action, and frequently communicated with my attorneys by
3 telephone, text message, and email to provide insight and perspective on the case.

4 18. I spoke with my attorneys and provided questions to be asked of Naval Engineering for
5 documents and information related to the case. I made myself available for the mediation, and
6 throughout the lawsuit, and I regularly contacted my lawyers for updates and to answer their questions.

7 19. I understand that I may be entitled to an additional payment for acting as a class
8 representative, and that this payment is subject to Court approval. Considering the time I devoted to
9 the case, the concerns I address above, the risks, and the results achieved through the settlement, I
10 believe that the requested service payment of \$7,500.00 is reasonable.

11 20. It is hard to determine exactly how much time I spent on my case. Some weeks required
12 much more time than others, such as during the pre-lawsuit investigation and discovery, and the lead
13 up to the mediation. I spent a considerable amount of time working on my case, during my personal
14 and family time outside of work hours, and I spent even more time thinking about this case. I am glad
15 it has come to a successful conclusion.

16
17 I declare under penalty of perjury under the laws of the State of California and the United
18 States of America that the foregoing is true and correct.

19
20 Dated: 16 ene 2026

Rolando de luna

21
22 Rolando de Luna