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Carlos Marquez

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
person,

Plaintiffs,

v.

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

Defendants.

Case No.: 37-2024-00023814-CU-OE-CTL

*[Assigned for All Purposes to the Hon.
Katherine A. Bacal, Dept. C-63]*

**DECLARATION OF CARLOS MARQUEZ
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Final Approval Hearing:

Date: February 20, 2026

Time: 1:30 p.m.

Dept: C-63

Action Filed: May 22, 2024

DECLARATION OF CARLOS MARQUEZ

I, Carlos Marquez, declare as follows:

1. I am an adult, and if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am a former employee of Naval Engineering Support Inc. (“Defendant”). I worked for Defendant from approximately December 2023 to approximately April 2024. Throughout the entirety of my employment, I was subject to all of Defendant’s policies and practices that have been alleged as unlawful in this action and in the Private Attorneys General Act (“PAGA”) Notice sent to Defendant and the Labor & Workforce Development Agency.

4. I initiated this lawsuit because I was concerned that I was not paid properly for all the hours that I worked, and I was not provided all of my meal and rest breaks.

5. By filing this lawsuit as a class representative, I hoped that I might be able to change Defendant’s policies to better protect the working conditions of my co-workers. I also understood that it was my duty as a class representative to represent the best interests of the class, know about the lawsuit, assist my attorneys, and keep updated on the case.

6. I have invested a lot of personal time and energy into this lawsuit. As detailed more fully below, I have spent approximately 40 hours on this case. I made it a priority to be actively involved because I wanted to do everything I could to assist my attorneys in prosecuting this case.

7. Throughout this case, I spent a lot of time on the phone with my attorneys to get updates about the case and provide them with information. For example, during some of the phone calls, my attorneys and I were able to identify instances when I was not paid correctly. Additionally, leading up to the mediation, I had significant communication with Wilshire Law

Firm, PLC regarding the claims at issue and what was to transpire at the mediation.

8. Throughout the case, I also spent time looking for documents relevant to the case to send to my attorneys. I spent time looking for these documents, including when I first contacted my attorneys, before my attorneys filed the case, and before my case was mediated. I also spent time reviewing legal documents in this case, including the retainer and settlement agreement and discussed, in detail, the terms with my attorneys.

9. Additionally, I made myself fully available on the day of mediation and was in continuous contact with my attorneys to assist with any questions or issues that may have arisen.

10. I believe the settlement is a good settlement and I would recommend that the Court approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad that I had the opportunity to represent the class in this lawsuit and that I was able to recover money through a settlement for the class.

11. I did not make the decision to file a class action lightly. I was concerned by the attention a publicly filed lawsuit, and especially a class action, would attract. My name would be associated with a lawsuit that I filed against my former employer. I am mindful that prospective employers might find out that I sued Defendant. Nevertheless, I felt that important rights were at stake that hurt everyone, and something ought to be done about it.

12. I also understand that there was financial risk in bringing this lawsuit. For example, I knew that if I did not prevail in this lawsuit that I could potentially be responsible for attorney fees and costs.

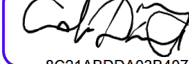
13. I understand that the settlement agreement provides a service payment to me of up to \$7,500.00. I believe this amount is fair compensation for my time and effort for aiding in the prosecution of this case, and the risks with respect to my future employment. In addition, the settlement requires that I enter into a general release, which I understand is broader than the release that will bind other class members. I am receiving no compensation additional to that provided for in the settlement.

14. Based on my involvement in this case and the benefits provided to my former coworkers, I can say I helped stand up for the other workers who were too afraid to say anything

to management because they did not want to risk losing their jobs or risk the stigma of suing an employer. I was not afraid to take that risk because I strongly care about helping my former coworkers.

15. I reviewed, and ultimately signed, the revised Class Action and PAGA Settlement Agreement and my attorneys answered all the questions I had. I believe the settlement terms and allocations are fair, adequate, and reasonable given the strength of the class claims and defenses.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 1/27/2026 at Chula Vista, California.

Signed by:


Carlos Marquez