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JOSUE ISRAEL JERONIMO BRAN

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

STEPHEN ARMAS and JOSUE
ISRAEL JERONIMO BRAN, as individuals
and on behalf of others similarly situated and
the State of California under the Private
Attorneys General Act,

Plaintiffs,

vs.

JJ&S ASBESTOS REMOVAL, INC., and
DOES 1 through 50, inclusive,

Defendants.

Case No. 24CU000405C

*[Assigned for All Purposes to Hon. Blaine K.
Bowman, Dept. C-74]*

**DECLARATION OF PLAINTIFF
STEPHEN ARMAS IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: October 2, 2026

Time: 8:30 a.m.

Dept.: C-74

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STEPHEN ARMAS

1 I, Stephen Armas, declare as follows:

2 1. I am over 18 years of age and am the named Plaintiff in this lawsuit. I am familiar
3 with 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
5 Action Settlement filed in my case. If called as a witness, I would competently testify honestly
6 to the below facts based on my personal knowledge.

7 3. From December 2022 through May 2024, I was employed by Defendant JJ&S
8 Asbestos Removal, Inc. ("Defendant") as a Project Estimator and Superintendent. I was paid as
9 an hourly wage employee.

10 4. During my employment, I became familiar with Defendant's employment
11 practices, which led me to identify payment issues that I alleged in the complaints filed by my
12 lawyers 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 JJ&S Asbestos Removal, Inc.

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

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

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

27 10. I filed this lawsuit on July 10, 2024, and have stayed involved since then by
28

1 reviewing policies and documents, emailing, texting, and calling my lawyers, and responding to
2 their questions as needed.

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

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

9 13. I think that the total settlement of \$310,000, where individuals are going to
10 passively receive compensation, is significant. It is something I am proud of. I am aware that no
11 other employees have taken action to bring this case and that this case was the catalyst for
12 recovery to class members.

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

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

24 16. Even though my lawyers tell me I likely could have a settlement on an individual
25 basis, this would not have been fair to my coworkers. After more than a year of litigation, I feel
26 good about seeing the case through and bringing it to a final close.
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18. I spoke with my attorneys and provided questions to be asked of Defendant for documents and information related to this case. I made myself available for mediation, and throughout this lawsuit, and I regularly contacted my lawyers for updates and to answer their questions.

19. I understand that I may be entitled to an additional payment for acting as a class representative, and that this payment is subject to Court approval. Considering the time I devoted to this case, the concerns I address above, the risks, and the results achieved through the settlement, I believe that the requested service payment totaling \$20,000 is reasonable, where I will receive \$10,000 and Plaintiff Jeronimo Bran will receive \$10,000.

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

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct. Executed on 09/08/2026,
in San Diego CA.

Stephen Armas
Stephen Armas