

Arby Aiwazian (SBN 269827)
Ryan Slinger (SBN 351297)
Alborz Javaheri (SBN 364246)
LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Telephone: (818) 265-1020 / Fax: (818) 265-1021

S. Emi Minne (SBN 253179)
Jill J. Parker (SBN 274230)
Yasmin Wilber (SBN 360905)
PARKER & MINNE, LLP
700 South Flower Street, Suite 1000
Los Angeles, California 90017
Tel: (310) 882-6833 / Fax: (310) 889-0822

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF RIVERSIDE

KENNETH KASTELZ, individually, and on
behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiff,

vs.

FLEETWOOD ALUMINUM PRODUCTS,
INC., an unknown entity; FLEETWOOD
ALUMINUM PRODUCTS, LLC, a
Delaware limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

Case No. CVRI2406069

Honorable Harold W. Hopp
Department 1

**DECLARATION OF RYAN SLINGER IN
SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PAGA
SETTLEMENT**

Date: May 26, 2026
Time: 8:30 a.m.
Department: 1
Reservation No.: 623431660166

Complaint Filed: October 10, 2024
Trial Date: None Set

DECLARATION OF RYAN SLINGER

I, Ryan Slinger, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Kenneth Kastelz (“Plaintiff”). The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PROCEDURAL HISTORY

2. On August 6, 2024, Plaintiff provided notice by electronic upload to the Labor and Workforce Development Agency (“LWDA”) and written notice by certified mail to Defendants of the specific provisions of the California Labor Code that were alleged to be violated (“PAGA Notice”).

3. On October 10, 2024, Plaintiff filed the Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, *Et Seq.* in the Superior Court of California for the County of Riverside, thereby commencing the above-captioned lawsuit.

4. On December 5, 2024, Defendants Fleetwood Aluminum Products Inc. and Fleetwood Aluminum Products, LLC (together, “Defendants”) filed their Answer to Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, *Et Seq.*

5. On October 30, 2025, the Parties participated in an all-day mediation presided over by Todd Smith, Esq., a well-respected mediator experienced in mediating complex labor and employment matters.

WORK PERFORMED BY PLAINTIFF’S COUNSEL

6. Several attorneys at Lawyers *for* Justice, PC have been actively engaged in this litigation from the inception of the above-captioned action, which was filed on October 10, 2024. Lawyers *for* Justice, PC has fully and actively participated in the litigation process throughout the pendency of the litigation. Lawyers *for* Justice, PC joined forces with counsel Parker & Minne, LLP (together, the firms are referred at as “Plaintiff’s Counsel”) to pursue the case. The work of the firms has been a coordinated and combined effort. Ultimately, the efforts of Plaintiff and

1 Plaintiff's Counsel have resulted in a settlement recovery.

2 7. Before initiating the case, Lawyers for Justice, PC investigated and researched the
3 facts and circumstances underlying the pertinent factual and legal issues and applicable law. This
4 required thorough discussions and interviews between attorneys at Lawyers for Justice, PC and
5 Plaintiff, and research into the various legal issues involved in the case, namely, the current state
6 of the law as it applied to representative actions, off-the-clock theory, meal and rest periods, and
7 wage-and-hour law and enforcement, Plaintiff's claims and allegations, and potential defenses.
8 Plaintiff's core allegation is that Defendants with respect to Plaintiff, Aggrieved Employees and
9 the State of California, *inter alia*, engaged in conduct giving rise to penalties recoverable under
10 the Private Attorneys General Act of 2004 (California Labor Code sections 2698, et seq.).

11 8. Plaintiff's Counsel conducted formal and informal discovery and investigation into
12 the facts of the case, to assess the veracity, strength, and scope of the claims, prior to reaching the
13 Settlement. The Parties exchanged a volume of information, documents, and data in the course of
14 the litigation and in connection with the mediation and settlement negotiations. Plaintiff's Counsel
15 propounded multiple sets of formal written discovery requests onto Defendants (specifically, Form
16 Interrogatories—General (Set One), Special Interrogatories (Sets One & Two), and Requests for
17 Production of Documents (Set One)). The information, documents, and data that were reviewed
18 and analyzed by Plaintiff's Counsel included and were not limited to: Aggrieved Employees' time
19 and payroll data, Plaintiff's employment records, and Defendants' operations and employment
20 practice, policies, and procedures, among other information and documents. Plaintiff's Counsel
21 had the opportunity to obtain information from Plaintiff, and reviewed and analyzed a volume of
22 information, data, and documents obtained from Plaintiff, Defendants, and other sources.
23 Plaintiff's Counsel developed liability, damages, violation, and penalties valuation models in the
24 course of litigation and in connection with the mediation and settlement negotiations and
25 settlement. Other work performed by Plaintiff's Counsel included, and was not limited to, case
26 strategy and analysis; researching, drafting, reviewing, and/or revising the pleadings, motion-
27 related papers, and settlement documents; and preparing for settlement negotiations, among other
28 tasks.

9. After conducting significant investigation of the facts and law during the prosecution of the case, counsel for the Parties engaged in extensive settlement negotiations to try to resolve the case. These efforts included participating in a formal mediation session conducted on October 30, 2025, by Todd Smith, Esq., a well-regarded mediator experienced in handling complex labor and employment matters. During all settlement discussions, the Parties conducted their negotiations at arm's length in an adversarial position.

PLAINTIFF'S COUNSEL'S FEES REQUESTED BY PLAINTIFF'S COUNSEL

10. By way of the accompanying Motion for Approval, Plaintiff's Counsel seek attorneys' fees in the amount of \$203,008.40, which is 35% of the Gross Settlement Amount of \$580,024.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Plaintiff's Counsel, Plaintiff has agreed to a contingency fee of at least 35% of the recovery.

11. The attorneys' fees sought are commensurate with: (1) the risk that Plaintiff's Counsel took in commencing the case; (2) the time, effort, and expense that Plaintiff's Counsel dedicated to the case; (3) the skill and determination that Plaintiff's Counsel have shown; (4) the results that Plaintiff's Counsel have achieved throughout the litigation; (5) the value of the settlement that Plaintiff's Counsel have achieved in the case; and (6) the other cases that Plaintiff's Counsel have turned down in order to devote their time and efforts to this matter.

12. The nature of the work performed, skill exercised, and the outcome in this matter support the percentage fee sought. This matter involves an outstanding monetary recovery involving a Gross Settlement Amount of \$580,024.00—with an Aggrieved Employees' Fund of approximately \$121,251.63 to be paid to Aggrieved Employees.

13. While not necessarily required to be demonstrated because the percentage fee is proper for this settlement, Plaintiff's Counsel have incurred many hours of work in connection with prosecuting the case such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers for Justice, PC have spent at least **72.10 hours** performing tasks and obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for Justice, PC and the time incurred by them in performing those services. These hours include

work done by several attorneys at Lawyers *for* Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers *for* Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

14. The work performed in this particular matter, the background of Lawyers *for* Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment class action and representative action cases, support a reasonable blended hourly rate of compensation of at least \$850 per hour for work performed by Lawyers *for* Justice, PC. Lawyers *for* Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$850 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation at the rate of \$919.57 per hour; and final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved compensation at the rate of \$855.96 per hour.

EXPERIENCE AND ADEQUACY OF

LAWYERS *for* JUSTICE, PC

15. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is attorney of record in over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act ("PAGA")

1 representative actions. The firm has successfully litigated cases involving nearly every aspect of
2 California wage and hour law, including payment of overtime and minimum wage, provision of
3 meal and rest breaks and/or premium wages for same, timely payment of wages, provision of
4 compliant wage statements, reimbursement of business expenses, executive, administrative, and
5 other overtime exemptions to the State of California and federal overtime compensation
6 requirements, PAGA claims, and sister statutes under federal law. During a relatively short time,
7 in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on
8 behalf of thousands of individuals in California.

9 16. Edwin Aiwarzian is the Managing Member and Shareholder of Lawyers *for* Justice,
10 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and
11 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has
12 extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute
13 Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has
14 previously served as a pro bono mediator for the Los Angeles County Superior Court. In October
15 of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During
16 the summer of 2000, he studied Legal Writing at Harvard University. From approximately
17 September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable
18 Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From
19 approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the
20 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
21 In December of 2004, he obtained a license to practice law from the California State Bar. Since in
22 or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively
23 focused on the prosecution of consumer and employment class actions. While employed by
24 Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over
25 one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial,
26 and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the
27 firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases
28 involving the executive, administrative, and other overtime exemptions to the State of California

1 and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC
2 has successfully obtained class certification by contested motion practice in approximately sixteen
3 (16) cases in the last decade and litigated over 1,000 class action or representative action cases.

4 17. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He
5 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
6 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
7 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
8 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
9 From approximately August 2008 to approximately December 2008, he served as a Judicial Extern
10 to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit.
11 He was admitted to practice law in California in 2010. He is admitted to practice before all courts
12 of the State of California and all United States District Courts in the State of California. He has
13 worked on many wage-and-hour class action and representative action cases, taking the lead in
14 taking and defending depositions, arguing motions, and attending mediations. He has played an
15 integral role in preparing matters for class certification, including and not limited to, successful
16 certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No.
17 BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.
18 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No.
19 RG13680477). Under his supervision, dozens of class action or representative action cases have
20 resulted in settlements that have been granted court approval. He has handled over one hundred
21 and fifty (150) mediations and worked on over two hundred and fifty (250) class action or
22 representative action cases which have resulted in settlement.

23 18. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a
24 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
25 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
26 Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010)
27 and in New York (since 2013), and she is admitted to practice in all U.S. District Courts in
28 California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme

1 Court. She has taken and defended dozens of depositions and successfully handled motion practice
2 in class action cases regarding discovery (including and not limited to, regarding class contact
3 information), class certification (both contested class certification and stipulated class
4 certification), arbitration agreements, coordination, and intervention. She has successfully handled
5 briefing and oral argument on appeal and obtained notable decisions regarding the Private
6 Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential*
7 *Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24, 2017),
8 cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th 175 (2019). She has
9 significant experience with class actions, including and not limited to working on cases to obtain
10 class certification through contested motion practice and working on cases in the post-certification
11 stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial
12 preparation in conjunction with co-counsel in a case involving a certified class consisting of
13 approximately 2,600 individuals). She also has extensive experience with class action and/or
14 representative action settlements, and she has handled this process in over three hundred (300)
15 cases. Under her, Edwin Aiwazian and Arby Aiwazian, Lawyers *for* Justice, PC has handled the
16 class certification and court approval process for hundreds of class action and/or representative
17 action matters that have successfully resolved. She is a member of the California Employment
18 Lawyers Association and, on several occasions, she has been a speaker regarding topics in wage
19 and hour law at the organization's continuing legal education events.

20 19. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts degree
21 from the University of Michigan in 2020, and I earned my Juris Doctor degree from Loyola Law
22 School in 2023. I was admitted to practice law in California in 2023. I am admitted to practice
23 before all courts of the State of California. I have worked on many wage-and-hour class action and
24 PAGA representative cases, and my work on these cases has included preparing pleadings and
25 motions, making court appearances, drafting and finalizing settlement agreements.

26 **LITIGATION COSTS AND EXPENSES INCURRED BY**

27 **LAWYERS *FOR* JUSTICE, PC**

28 20. To date, Plaintiff's Counsel have borne all of the risks and costs of litigation and

1 will not receive any compensation until recovery is obtained in this matter. The Settlement
2 provides for reimbursement of Plaintiff's Counsel's litigation costs and expenses in the amount of
3 up to \$20,000.00. Lawyers *for* Justice, PC seeks reimbursement of **\$15,367.49** in litigation costs
4 and expenses incurred in this matter, as reflected in "EXHIBIT B" attached hereto. These
5 expenses were reasonable and necessary in the prosecution of this matter and to obtain the
6 Settlement Agreement.

7 **ENHANCEMENT PAYMENT TO PLAINTIFF**

8 21. In exchange for his broader individual waivers and release of claims against the
9 Released Parties with a California Civil Code Section 1542 waiver (set forth in Paragraph 53 of
10 the Settlement Agreement), and also in recognition of his effort and work spearheading the
11 prosecution of the case and serving as the PAGA Representative, the Settlement provides for a
12 Enhancement Payment in the amount of up to \$10,000.00 to Plaintiff. Plaintiff spent a substantial
13 amount of time and effort discussing his employment with Plaintiff's Counsel, gathering and
14 providing relevant documents and information, and providing facts and evidence to support the
15 prosecution of the claims. Plaintiff was available whenever Plaintiff's Counsel needed him and
16 actively tried to obtain and provide information that would help obtain a recovery in this matter.
17 Accordingly, it is fair and appropriate for Plaintiff to receive \$10,000.00 as a reasonable
18 Enhancement Payment, in addition to his Individual PAGA Payment.

19 22. I submit that the Agreement is fair, reasonable, and adequate, and is in the best
20 interests of Plaintiff, Aggrieved Employees and the State of California.

21 I declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct.

23 Executed this 10th day of March 2026, at Glendale, California.

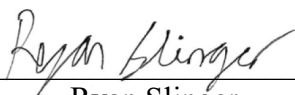
24 
25 Ryan Slinger
26
27
28

EXHIBIT A

KENNETH KASTELZ V. FLEETWOOD ALUMINUM PRODUCTS, INC.
Riverside County Superior Court Case No. CVRI2406069

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Kenneth Kastelz (“Plaintiff”)	7.50
Investigate, Communicate with, Interview, and/or Review Communication with Aggrieved Employees and/or Percipient Witnesses	5.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Private Attorneys General Act (“PAGA”) Claim, Conduct Legal Research and Analysis Regarding PAGA Claim, and Draft, Review, and/or Revise Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, <i>Et Seq.</i> (filed on October 10, 2024)	7.50
Review Court’s Notice of Case Management Conference and Notice of Department Assignment (filed on October 30, 2024)	0.20
Review and Analyze Defendant Fleetwood Aluminum Products, LLC’s Answer to Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, and Research Affirmative Defenses in Defendant Fleetwood Aluminum Products, LLC’s Answer (served on December 5, 2024)	1.10
Draft, Review, and/or Revise Plaintiff’s Notice of Change of Address or Other Contact Information (filed on January 30, 2025)	0.10
Draft, Review, and/or Revise Plaintiff’s Notice of Association of Counsel (filed on February 26, 2025)	0.10

Meet and Confer with Defendant Fleetwood Aluminum Products, LLC's Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on April 10, 2025)	0.20
Meet and Confer with Defendant Fleetwood Aluminum Products, LLC and Fleetwood Aluminum Products, Inc.'s (together, "Defendants") Counsel, and Draft, Review, and/or Revise Joint Stipulation Regarding Discovery and Mediation (submitted on April 22, 2025)	0.20
Review Court's Minute Order Re: Case Reassignment (filed on April 24, 2025)	0.20
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on May 20, 2025)	0.20
Review Court's PAGA Case Management Order #1 (filed on May 30, 2025)	0.40
Review Court's Minute Order Re: Case Management Conference (filed on June 4, 2025)	0.10
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Case Management Conference Statement (filed on November 14, 2025)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on December 1, 2025)	0.10
Discovery and Deposition	
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Kenneth Kastelz (served on September 11, 2024)	6.10
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Fleetwood Aluminum Products, Inc. (served on December 3, 2024)	4.50
Draft, Review, and/or Revise Plaintiff's Form Interrogatories – General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), and Requests for Production of Documents (Set One) to Defendant Fleetwood Aluminum Products, LLC (served on December 3, 2024)	3.20
Letters and Correspondence	
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Under the Private Attorneys General Act (served on August 6, 2024)	4.50

Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with Defendants' Counsel	7.10
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendants, and Other Sources Prior to Mediation, and Draft, Review, and/or Revise Mediation Brief, Supporting Materials, and Penalties Analyses and Calculations for Mediation	16.50
Review and Analyze Mediator's Proposal (Term Sheet) (issued October 30, 2025)	0.50
Draft, Review, Revise, and/or Analyze Memorandum of Understanding of PAGA Settlement (executed on December 1, 2025)	0.50
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of PAGA Settlement (executed on January 30, 2026), and Draft, Review, and/or Revise Notice of Representative Action Settlement	1.10
Law and Motion	
Draft, Review, and/or Revise Declaration of Ryan Slinger in Support of Plaintiff's Motion for Approval of Private Attorneys General Act Settlement Agreement	4.50
Total Hours:	72.10

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Kastelz vs. Fleetwood Aluminum Products, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
8/2/2024	U.S. Postmaster	Postage	\$20.00
8/6/2024	U.S. Postmaster	Postage	\$20.00
8/6/2024	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
10/30/2024	Legal Document Server, Inc.	Attorney Service	\$48.58
10/30/2024	Riverside Superior Court	Complaint Filing Fee	\$450.00
11/4/2024	Elite Litigation Support	Attorney Service	\$176.50
11/7/2024	Elite Litigation Support	Attorney Service	\$153.25
11/22/2024	Legal Document Server, Inc.	Attorney Service	\$17.30
12/3/2024	General Logistics Systems US, Inc.	Courier Service	\$47.76
1/31/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
3/6/2025	Legal Document Server, Inc.	Attorney Service	\$18.30
7/3/2025	Todd Smith, Esq.	Mediation Fee	\$10,000.00
11/6/2025	Berger Consulting Group, LLC	Data Analysis of Sampling of Time Records	\$4,322.50
Total:			<u>\$15,367.49</u>