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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF IMPERIAL

JESUS RIOS and EMILIO CASTRO
ORTEGA individually on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiff,

v.

RMP SUPPLY TRIM, INC., a California
Corporation; and DOES 1-50, Inclusive,

Defendants.

Case No: ECU003902

**DECLARATION OF PLAINTIFF
EMILIO CASTRO ORTEGA IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Hearing Date: September 15, 2026

Hearing Time: 8:30 a.m.

Department: 5

DECLARATION OF EMILIO CASTRO ORTEGA

I, Emilio Castro Ortega, declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the proposed class and PAGA representatives in *Rios v. RMP Supply Trim, Inc.*, Imperial County Superior Court Case No. ECU0039002. I have personal knowledge of the facts stated herein and if called as a witness I could and would competently testify thereto.

2. I worked for Defendant from approximately June 2023 through August 2024. During my employment, I was classified as a non-exempt employee and paid on an hourly basis.

3. I reached out to my attorneys at Protection Law Group, LLP to discuss my employment with Defendant and the ways I believed I had been undercompensated during my employment. I spoke with class counsel extensively and discussed issues regarding Defendant's policies and practices, and generally my employment with Defendant.

4. After speaking with my attorneys, I agreed to serve as a class representative in a case against Defendant. I was aware that serving as class representative could involve additional work including my deposition being taken. I understood it was my responsibility to vigorously prosecute this case to obtain recovery of damages and penalties for the other class members and that I would have additional duties and obligations, such as responding to written discovery, assisting my attorneys, traveling and participating in the case when needed, and monitoring the progress of the case. I still agreed to serve as class and PAGA representative in order to recover missing wages on behalf of others as well as myself.

5. Since initiating this lawsuit, I have considered the interests of the members of the Class just as I would consider my own interests and have understood that I must put the interests of the Class Members before my own interest. I am not aware of any interests that I have that are contrary to the interests of the proposed Class Members, and I do not know of any conflicts of interest that would keep me from adequately representing the Class.

6. Since becoming involved in this matter, I have spent significant time meeting with my attorneys at Protection Law Group, LLP regarding the case and fulfilling my responsibilities as a class and PAGA representative. As the case moved forward, I have had several extensive

1 conversations with my attorneys, during which I provided substantial information regarding
2 Defendant's policies, practices, and procedures, as well as my own experiences working for
3 Defendant. At my attorneys' request, I searched for any documents I'd been provided by Defendant
4 including old wage statements, notes I'd taken regarding my employment, and any type of policy
5 documents I had signed or been given.

6 7. Throughout my involvement in this case, I have routinely checked in with my
7 attorneys and their staff to monitor the status of the case. I had several additional phone calls with
8 my attorneys throughout the case and attempted to respond promptly whenever my attorneys
9 contacted me or needed additional information. In addition, I assisted my attorneys in preparing
10 for the mediation in this action, answered questions during the course of mediation, and discussed
11 issues related to the settlement of this action.

12 8. When the case settled I reviewed the Settlement Agreement and discussed its terms
13 with my attorneys. I kept in contact with my attorneys throughout the settlement process and
14 provided additional information when my attorneys reached out to me. I will continue to actively
15 participate in this lawsuit and monitor the case until it is finalized.

16 9. I believe I took on a substantial risk in agreeing to serve as the class and PAGA
17 representative, despite being made aware that there was no certainty regarding the outcome of the
18 case or how long it would take to recover the wages owed to myself and the other class members.

19 10. Although I was concerned about being the class representative in a public lawsuit I
20 decided to put my own interest aside and bring forth a lawsuit that would be beneficial to all Class
21 Members. I have not yet suffered any adverse consequences as a result of this lawsuit, but neither
22 have I yet received any benefit for representing the Class or for the help I provided my attorneys.

23 11. I believe that I have done everything that my attorneys have asked of me and have
24 tried, to the best of my ability, to represent the Class. I think my efforts helped get the result
25 obtained in this case.

26 12. In addition, as part of the Settlement Agreement, I am agreeing to a general release
27 of all my claims against Defendant, which is much more extensive than the limited release by the
28 Class Members.

13. Accordingly, I respectfully request that the Court award me the incentive payment in the amount of \$10,000.00 in recognition of this general release, the benefit I helped obtain for other putative class members, and my active participation in this case. I believe that this amount is fair and reasonable in light of the time I have spent on this case, the risks I assumed bringing the lawsuit and the broader release I have agreed to as part of the Settlement.

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

Executed on 4/17/2026.

Firmado por:

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 Emilio Castro Ortega