

BIBIYAN LAW GROUP, P.C.

Vedang J. Patel (SBN 328647)

vedang@tomorrowlaw.com

Triana Henderson (SBN 359833)

thenderson@tomorrowlaw.com

1460 Westwood Boulevard

Los Angeles, California 90024

Tel: (310) 438-5555; Fax: (310) 300-1705

Attorneys for Plaintiff Brian Amaya,
on behalf of himself and all others similarly situated
and aggrieved

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF RIVERSIDE

BRIAN AMAYA, an individual, and on behalf
of all others similarly situated,

Plaintiff,

v.

PUROSIL LLC, a California Limited Liability
Company; and DOES 1 through 100,
inclusive,

Defendant.

CASE NO.: CVRI2407159

(Related to Case No. CVRI2503917)

[Assigned for all purposes to the Hon. Harold
W. Hopp, Dept. 1]

**DECLARATION OF PLAINTIFF BRIAN
AMAYA IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND
REPRESENTATIVE ACTION
SETTLEMENT**

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

8
9
0
1
2
3
4
5
6
7
8

2
3
4
5
6
7
8

6
7
8

1 8. I do not recall receiving any premium pay for the full rest breaks I was not provided
2 an opportunity to take and am informed and believe that my coworkers were not provided
3 premium pay for not being provided with the opportunity to take full, uninterrupted 10-minute
4 rest periods, either.

5 9. Before and during the course of litigation, I was actively involved in assisting my
6 attorneys to support the wage and hour claims asserted. My involvement began before the initial
7 complaint was filed wherein, I provided first-hand knowledge and documentation as to
8 Defendant's practices, their ownership and corporate structure, and their wage and hour policies
9 and practices.

10 10. Part of the information I relayed was with regard to Defendant's timekeeping policies
11 and practices, and their meal and rest period policies and practices.

12 11. I provided them with all the documentation provided to me by Defendant during my
13 employment.

14 12. I assisted in reviewing time and payroll records with my attorneys, and informed
15 them of Defendant's employment policies, and whether those policies matched Defendant's
16 practices.

17 13. My attorneys called me to ask me questions over several times throughout the
18 litigation and I contacted my attorneys several times to stay updated on the case and offer my
19 assistance on any matters I could be helpful with. I was also available for mediation by telephone,
20 during which I was available to be called to answer the questions posed by the mediator regarding
21 the asserted claims, as well as arguments raised by Defendant. In addition, I worked with my
22 attorneys over the next several weeks after mediation to understand and execute a long form
23 settlement agreement.

24 14. Over the past few months since the mediation has been resolved, I have stayed in
25 touch with my attorneys to ensure that there was no undue delay in payment for other class
26 members for whom I brought this Action.

27 ///

28 ///

1 15. I believe that, through the present, I have spent at least twenty-five (25) hours in
2 connection with this matter, which included time spent having preliminary calls with my
3 attorneys; doing an intake with my attorneys; time spent searching for documents relating to my
4 employment; time spent responding to informal discovery; time spent reading and understanding
5 the Settlement Agreement; time spent answering calls to discuss Defendant's timekeeping, pay,
6 meal and rest periods, and to review time and payroll records; time spent discussing with my
7 attorneys Defendant's policies and practices; time spent on-call at mediation; and time spent
8 checking in on the status of the case, among other things. I also spent time preparing this
9 declaration to support Plaintiff's Motion for Preliminary Approval of Class and Representative
10 Action Settlement.

11 16. I feel that by bringing this lawsuit, I could stand up for not only my rights but the
12 rights of other employees who suffered from the same unfair wage practices. I felt that current
13 employees might not want to share their experiences with Defendant since they feared losing their
14 jobs. This is certainly understandable as I, too, have to provide for myself and others.

15 17. By bringing this lawsuit, I have put the interests of the class ahead of my own.

16 18. I understood that I could possibly earn a small enhancement if this case is resolved
17 favorably. I also knew that I could face retaliation from Defendant and backlash from former
18 coworkers who are loyal to Defendant. I have also had to provide a general release of claims to
19 Defendant as part of the settlement. My understanding, in addition, is that if I brought this case
20 individually, I may have earned more compensation individually and on a much quicker timeline
21 than the timeline to resolve this Action.

22 19. My goal in bringing this lawsuit was to obtain a recovery on behalf of the class,
23 and, even more importantly, to put an end to what I believe are illegal practices on the part of
24 Defendant. I believe I have achieved both through this lawsuit and settlement.

25 ///

26 ///

27 ///

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct this 18 day of 8 2026, at Riverside California.

Brian Amaya

BRIAN AMAYA