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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

JOSE RUELAS, an individual, on behalf of
himself, and on behalf of all persons similarly
situated,

Plaintiff,

v.

SEA WEST SERVICES LLC, a California
limited liability company; and DOES 1-50,
Inclusive,

Defendants.

Case No. 23CV038585

**DECLARATION OF JOSE RUELAS IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: November 12, 2024

Time: 1:30 p.m.

Reservation ID: 534837948725

Judge: Hon. Noël Wise

Dept.: 21

1 I, JOSE RUELAS, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am the named Plaintiff in the above
4 wage and hour class and representative action filed against Sea West Coast Guard Federal Credit Union
5 (hereinafter "Defendant").

6 2. This declaration is being submitted in support of Plaintiff's Motion for Preliminary
7 Approval of Class Action and PAGA Settlement.

8 3. I believe that I am, have been and will continue to represent the interests of the class
9 fairly and adequately. I have claims that are typical of the claims of the Class Members that I am
10 seeking to represent.

11 4. I worked for Defendant as a non-exempt employee in California between August of
12 2021 to January of 2023. At all times during my employment, I was paid in an hourly wage and was
13 entitled to legally compliant meal and rest periods. Throughout my employment, I was subject to
14 Defendant's written policies and procedures.

15 5. Generally, my lawsuit claims that Defendant failed to pay for all time worked, failed to
16 furnish accurate itemized wage statements, failed to provide compliant meal and rest periods, failed
17 to pay overtime and sick pay at the correct regular rate of pay, failed to reimburse for mandatory
18 business expenses, and failed to pay all wages when due.

19 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
20 to represent because I was subject to the same alleged unlawful employment policies and practices at
21 issue in this action, including but not limited to, Defendant's failure to pay for all time worked, failure
22 to furnish accurate itemized wage statements, failure to provide compliant meal and rest periods,
23 failure to pay overtime and sick pay at the correct regular rate of pay, failure to reimburse for
24 mandatory business expenses, and failure to pay all wages when due. Factually, Defendant's policies
25 and practices apply class wide, and Defendant's liability can be determined by facts common to all
26 members of the Class.

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7. Further, there is no conflict between my interests and the interests of the class that I am seeking to represent. My interests are coextensive with the interests of the Class. I allege that I was injured by the same company-wide policies and practices to which the proposed Class was subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests of the Class by initiating this litigation, participating in mediation, and evaluating the proposed settlement to assure that it is fair.

8. I understood that at the time I filed this action, as a Class Representative, I owed a duty to the putative class members to faithfully prosecute this action with their best interests at the forefront of every decision. I understood that I could not make any decision in this action for the sole benefit of my personal interest. I understood that in executing this duty, I might have been asked to sacrifice my personal best interests for the benefit of the interests of the putative class members. Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible relief for my former co-workers for what I perceived to be Defendant's unlawful wage and hour practices. I believe that I faithfully executed the duties of a Class Representative throughout this litigation and will continue to do until this litigation is fully and finally resolved.

9. I believe that the proposed settlement before the Court is fair, reasonable and adequate, and made in the best interest of the Settlement Class Members. Consequently, I respectfully ask the Court to grant preliminary approval of the Settlement and all of its terms.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed 10/15/2024, at Oakland, California.

By: Jose Ruelas (Oct 15, 2024 09:28 PDT)
JOSE RUELAS