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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

MARIA G. GONZALEZ ROMERO, an
individual, on behalf of herself, and on behalf
of all other aggrieved employees,

Plaintiff,

v.

CABE BROTHERS RENTALS, LLC, a
California Limited Liability Company; CABE
BROTHERS, a California Corporation; and
Does 1 through 50, Inclusive;

Defendants.

Case No.: 22STCV18688

**DECLARATION OF PLAINTIFF MARIA
G. GONZALEZ ROMERO IN SUPPORT
OF PLAINTIFF'S MOTION TO
APPROVE PAGA SETTLEMENT**

Date: December 13, 2024

Time: 8:30 a.m.

Judge: Hon. Colin P. Leis

Dept: 74

1 I, MARIA G. GONZALEZ ROMERO, declare as follows:

2 1. I am a party to this action and reside in the State of California. I am over the age of
3 18 and am fully competent to make this declaration. I have personal knowledge of the facts set forth
4 herein, except for those stated on information and belief, and as to those I am informed and believe
5 them to be true. If called upon to testify, I could and would testify as set forth herein.

6 2. I make this Declaration in support of Plaintiff's Motion to Approve PAGA
7 Settlement.

8 3. I was employed by Defendants Cabe Brothers Rentals, LLC and Cabe Brothers
9 (collectively referred to as "Defendants"), as a non-exempt, hourly-paid employee in California
10 from approximately December of 2016 to June of 2021.

11 4. Throughout my employment with Defendants, I am informed and believe that myself
12 and other non-exempt, hourly-paid employees of Defendants were not paid all wages owed because
13 we were not paid for all time under Defendants' control. In addition, I am informed and believe that
14 we were not paid or underpaid for overtime hours worked at the overtime rate of pay owed due to,
15 among other things, failure to pay for off-the-clock work and miscalculation of regular rate of pay.

16 5. During my employment with Defendants, I often took meal periods after the fifth
17 hour of my shift, I often took short meal periods, and I often took meal periods that were not duty-
18 free. I witnessed other non-exempt, hourly-paid employees with my job duties often taking meal
19 periods that after the fifth hour, short, or not duty-free, as well.

20 6. I do not believe I was provided with opportunities to take full, uninterrupted, 10-
21 minute rest periods while working for Defendants and believe my coworkers were not provided with
22 such an opportunity, either.

23 7. Before and during the course of litigation, I was actively involved in assisting my
24 attorneys to support the wage and hour claims asserted. My involvement began before the initial
25 complaint was filed. I provided first-hand knowledge and documentation as to Defendants'
26 practices, their ownership and corporate structure, and their wage and hour policies and practices.

27 8. Part of the information I relayed was with regard to Defendants' timekeeping policies
28 and practices, and their meal and rest period policies and practices.

1 9. I provided my attorneys with documentation provided to me by Defendants during
2 my employment.

3 10. I assisted in reviewing time and payroll records with my attorneys and informed them
4 of Defendants' employment policies and whether those policies matched Defendants' practices.

5 11. My attorneys called me to ask me questions several times throughout the litigation
6 and I contacted my attorneys several times to stay updated on the case and offer my assistance. I
7 was also available for mediation by telephone and was prepared to answer the questions posed by
8 the mediator regarding the asserted claims, as well as arguments raised by Defendants. In addition,
9 I worked with my attorneys for several months after mediation to understand and execute a long
10 form settlement agreement.

11 12. Over the past few months since the case has been resolved, I have stayed in touch
12 with my attorneys to ensure that there was no undue delay in payment for other aggrieved employees
13 who were represented in this Action.

14 16. I feel that by bringing this lawsuit, I could stand up for not only my rights but the
15 rights of other employees who suffered from the same unfair wage practices. I felt that current
16 employees might not want to share their experiences with Defendants, since they feared losing their
17 jobs.

18 20. My goal in bringing this lawsuit was to obtain a recovery on behalf of the aggrieved
19 employees and, even more importantly, to put an end to what I believe are illegal practices on the
20 part of Defendants. I believe I have achieved both through this lawsuit and settlement.

21 21. I understand the obligations of adequately representing the non-exempt, hourly paid
22 employees of the Defendants.

23 22. I understand the substantial burden I will have to undertake in order to represent the
24 non-exempt, hourly paid employees of the Defendants.

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I declare under penalty of perjury under the laws of the State of California that the foregoing
is true and correct this 5 day of November 2024, at Alhambra, California.


Maria Gonzalez Nov 5, 2024 10:39 PST

MARIA G. GONZALEZ ROMERO