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County of Los Angeles
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By G. Carini, Deputy Clerk

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14 ARTURO GONZALEZ

15
16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
17 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

18
19 ARTURO GONZALEZ, individually, and on
20 behalf of other members of the general public
similarly situated,

21 Plaintiff,

22 vs.

23 HUNT ENTERPRISES, INC., a California
corporation; and DOES 1 through 100, inclusive,

24 Defendants.

Case No.: 22STCV15057

*Assigned for all purposes to the Honorable
Lawrence P. Riff, Dept. 7*

**DECLARATION OF ARTURO
GONZALEZ IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: June 12, 2023
Time: 10:00 a.m.
Dept.: 7

Complaint Filed: May 5, 2022
Trial Date: Not set

1 **DECLARATION OF ARTURO GONZALEZ**

2 I, Arturo Gonzalez, declare as follows:

3 1. I am over 18 years of age and a resident of California. I am the named plaintiff and
4 in *Arturo Gonzalez v. Hunt Enterprises, Inc. et al.*, Los Angeles Superior Court Case No.
5 22STCV15057. I have personal knowledge of the facts stated herein and if called as a witness I
6 could and would competently testify thereto.

7 2. I make this declaration in support of the parties' Class Action and PAGA
8 Settlement Agreement ("Settlement" or "Agreement").

9 3. I am a former employee of Defendant Hunt Enterprises, Inc. ("Defendant"). I was
10 employed by Defendant as an hourly-paid, non-exempt plumber from approximately March 3,
11 2003 to January 28, 2020.

12 4. In approximately March of 2022, I reached out to my attorneys at Lawyers for
13 Justice, PC to discuss my employment with Defendant and the ways I believed I had been
14 undercompensated during my employment. I wanted to take steps to make sure that Defendant
15 was held accountable for not paying its employees properly. I spent several hours discussing my
16 experiences with the attorneys at Lawyers for Justice, PC, as well as complex wage and hour class
17 actions in general and what it meant to be a named plaintiff and class representative. After
18 speaking with my attorneys, I agreed to serve as a class representative in this action.

19 5. As part of becoming a class representative, I understood that I have a fiduciary
20 duty to the potential class. My duties were explained to me by my attorneys. I understood that in
21 representing the interests of other class members, I must put the interests of the class above my
22 own interests in this case. I was also aware that serving in this role required me to monitor the
23 progress of the lawsuit, to provide all relevant facts to assist my attorneys with the case, and to
24 actively participate in the case as necessary. I understood that it was by duty and responsibility to
25 vigorously prosecute this case to obtain the best possible recovery for the other class members,
26 and that I would have additional duties and responsibilities, such as responding to written
27 discovery, having my deposition taken, and traveling and participating in the case when need. I
28 understood that I might have to miss time from work in order to perform these duties. I still agreed

1 to serve as class representative in order to recover unpaid wages for Labor Code violations
2 suffered by myself and other employees.

3 6. Throughout the course of the case, I have spent a significant amount of time
4 meeting with my attorneys at Lawyers for Justice, PC and Parker & Minne, LLP regarding the
5 case and fulfilling my responsibilities as a class representative. I have had numerous, extensive
6 discussions with my attorneys regarding Defendant's policies, practices and procedures, how
7 Defendant operates, as well as my experiences generally working for Defendant. At my attorney's
8 request, I searched for any documents related my employment with Defendant, and provided
9 copies of any documents I was able to locate to my attorneys.

10 7. I have routinely checked in with my attorneys to monitor the status of the case. I
11 also promptly responded to several additional phone calls with my attorneys throughout the case
12 and provided additional information needed for the case, including extensive discussions prior to
13 mediation. I kept in contact with my attorneys throughout the mediation and provided additional
14 information when my attorneys reached out to me during the mediation. I will continue to actively
15 participate in this lawsuit and monitor the case until it is finalized.

16 8. When the case settled, I reviewed the Settlement Agreement and discussed its
17 terms with my attorneys. I recognize and accept that any resolution of this lawsuit is subject to
18 court approval, and must be designed in the best interest of the class as a whole. I believe the
19 Settlement is fair and reasonable in light of the issues presented by this case.

20 9. Since initiating this lawsuit, I have considered the interests of the class just as I
21 would consider my own interests and have put the interests of the other class members before my
22 own interests. I am not aware of any interests that I have that are contrary to the interests of the
23 proposed class members, and I do not know of any conflicts of interest that would keep me from
24 adequately representing the class.

25 10. I fully realized the risks I would be taking by pursuing this case as a named plaintiff
26 and class representative. I knew that future employers might conduct a background check on me
27 or otherwise find out about my participation in the lawsuit, and that serving as the class
28 representative could affect my employment opportunities and my ability to secure a job in the

1 future. I also knew that there was no certainty as to the ultimate outcome of this case, and that if
2 Defendant were to prevail in this action there was a possibility I could have been liable for
3 Defendant's litigation costs. Despite these risks, I felt so strongly about standing up for the rights
4 of Defendant's employees that I initiated and participated fully in this lawsuit.

5 11. I believe that I have done everything that my attorneys have asked of me and have
6 tried, to the best of my ability, to represent the class. I think my efforts helped get the result
7 obtained in this case. Accordingly, I respectfully request that the Court award me the Service
8 Payment in the amount of \$7,500.00 in recognition of the benefit I helped obtain for other putative
9 class members, and my active participation in this case. I believe that this amount is fair and
10 reasonable in light of the time I have spent on this case, the risk I assumed in acting as a class
11 representative, and the broader general release I have agreed to as part of the Settlement.


12 12. I am not related to anyone associated with Lawyers for Justice, PC or Parker &
13 Minne, LLP.

14 13. I have not entered into any undisclosed agreements, and I have not received any
15 undisclosed compensation in this case. The only compensation I will receive is whatever amount
16 the Court awards as a service award, as well as my share of the settlement fund as a class member.

17 14. I understand that my attorneys in this case - Lawyers for Justice, PC and Parker &
18 Minne, LLP - have agreed to equally split the attorneys' fees awarded in this case. I have been
19 provided a full written disclosure of this agreement and have consented to the agreement in
20 writing.

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 on 04/26/2023 at Gardena, California.

24 
25 Arturo Gonzalez (Apr 26, 2023 19:30 PDT)
26 Arturo Gonzalez