

1 ATKINSON, ANDELSON, LOYA, RUUD & ROMO
A Professional Law Corporation
2 William M. Betley State Bar No. 113326
WBetley@aalrr.com
3 April L. Szabo State Bar No. 261576
April.Szabo@aalrr.com
4 3880 Lemon Street, Suite 350
Riverside, California 92501-3667
5 Telephone: (951) 683-1122
Fax: (951) 683-1144
6

7 Attorneys for Defendant
NEXT LEVEL DOOR & MILLWORK, INC.
8

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF RIVERSIDE
11

12 FELIX REY GUTIERREZ, individually, and
on behalf of all others similarly situated,

13 Plaintiff,

14 v.

15 NEXT LEVEL DOOR & MILLWORK,
16 INC., a California corporation; and DOES 1
through 10, inclusive,

17 Defendants.
18

Case No. CVRI2105455

**DECLARATION OF CYNTHIA MORRIS
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT AGREEMENT**

Judge: Hon. Harold Hopp
Dept.: 1

Complaint Filed: November 30, 2021
Trial Date: Not Set

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20 **DECLARATION OF CYNTHIA MORRIS**

21 I, Cynthia Morris, declare as follows:

22 1. I am the Human Resources Manager for Defendant Next Level Door & Millwork,
23 Inc. ("NLD") in the above-entitled action. I am over the age of eighteen.

24 2. I have personal knowledge of the following matters or have knowledge from my
25 review of the documents maintained by NLD, as well as from my position as the Human Resources
26 Manager for NLD. If I were called as a witness to testify, I could and would competently testify as
27 to each of them.
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ATKINSON, ANDELSON, LOYA, RUUD & ROMO
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
3880 LEMON STREET, SUITE 350
RIVERSIDE, CALIFORNIA 92501-3667
TELEPHONE: (951) 683-1122
FAX: (951) 683-1144

1 3. I have been the Human Resources Manager for NLD for 6 years in total. As the
2 Human Resources Manager for NLD I handle employee relations, recruitment, payroll and other
3 matters.

4 4. NLD is a supplier and installer of residential, custom and commercial builder
5 products in the Southwestern United States, headquartered in Indio, California.

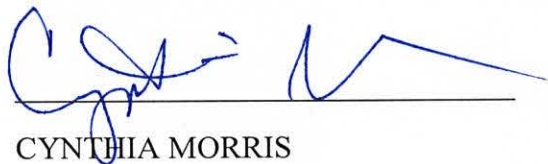
6 5. NLD had a total of 480 non-exempt employees during the class period.
7 Approximately 66 percent of the class worked as Installers and approximately 21 percent worked in
8 the Warehouse. Approximately 13 percent of the class worked in administrative roles in Accounts
9 Payable/Receivable, Customer Service, Human Resources or generally in the office.

10 6. It is not possible for me or any other employee at NLD to testify as to the average
11 education or experience level of the non-exempt employees in the class. This information is not
12 consistently gathered by NLD at the time of hire and is not consistently tracked in NLD's systems.

13 7. NLD is reasonably certain that its employees, including the non-exempt employees
14 in the class, are able to read and understand either or both English and Spanish. For this reason,
15 employee communications are consistently provided in both languages.

16 I declare under penalty of perjury under the laws of the State of California that the facts
17 stated above are true and correct.

18 Executed on this 16 day of August, 2023 at Indio, California.

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21 CYNTHIA MORRIS

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