

ELECTRONICALLY FILED
Superior Court of California
County of Sacramento
04/30/2024
By: A. Turner Deputy

1 Galen T. Shimoda (Cal. State Bar No. 226752)
2 Justin P. Rodriguez (Cal. State Bar No. 278275)
3 Renald Konini (Cal. State Bar No. 312080)
4 **Shimoda & Rodriguez Law, PC**
5 9401 East Stockton Boulevard, Suite 120
6 Elk Grove, CA 95624
7 Telephone: (916) 525-0716
8 Facsimile: (916) 760-3733

9 Attorneys for Plaintiffs CLINT DAVIDSON and
10 PATRICK WIRTH

11 **SUPERIOR COURT OF CALIFORNIA**
12
13 **FOR THE COUNTY OF SACRAMENTO**

14 JOE HART, individually and on behalf of all
15 other similarly situated employees,

16 Plaintiff,

17 vs.

18 ALUMINUM COATING TECHNOLOGIES,
19 INC., a California Corporation;
20 BRUCE CENICEROS, an individual;
21 ANDREA CENICEROS, an individual; and
22 DOES 1 to 100, inclusive,

23 Defendants.

Case No. 34-2022-00320564

*Assigned for all purposes to Lauri A. Damrell
Department 22*

CLASS ACTION

**SUPPLEMENTAL DECLARATION OF CLINT
DAVIDSON IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA SETTLEMENT**

Date: May 24, 2024

Time: 9:00 a.m.

Dept.: 22

Judge: Hon. Lauri A. Damrell

Filed: May 23, 2022

FAC Filed: July 29, 2022

SAC Filed: June 13, 2023

TAC Filed: August 25, 2023

Trial Date: None Set

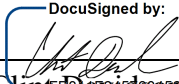
1 I, Clint Davidson, declare:

2 1. I am a competent adult, I have personal knowledge of the facts set forth in this
3 declaration, and I am providing this supplemental declaration on behalf of myself, as a named plaintiff,
4 and in support of Plaintiffs’ Motion for Preliminary Approval of Class Action and PAGA Settlement.

5 2. I have spent a substantial amount of time assisting my attorneys in this case and working
6 to secure a benefit for all Class Members and Aggrieved Employees. I have spent approximately 30-35
7 hours working on this case over the past year and that I will spend additional time on this case fielding
8 questions from Class Members about the settlement during the notice process and working with my
9 attorneys through any compliance hearing(s).

10 3. In my initial declaration, I incorrectly stated that I was providing a general release of all
11 claims. That final sentence regarding the general waiver was supposed to be deleted in the signature
12 copy of my declaration to be submitted to Court, but it was not and I did not notice the error prior to
13 signing the declaration.

14
15 I declare under penalty of perjury under the laws of the State of California that the foregoing is
16 true and correct. Executed on 4/23/2024 in Jackson, California.

17
18
19 DocuSigned by:

20 _____
Clint Davidson

21
22
23
24
25
26
27
28