

ELECTRONICALLY FILED
Superior Court of California
County of Sacramento

04/30/2024

By: A. Turner Deputy

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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
PATRICK WIRTH 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, Patrick Wirth, declare:

2 1. I am a competent adult, I have personal knowledge of the facts set forth in this
3 declaration, and I am making 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. Over the past year I have spent approximately 32-38 hours working with my attorneys to
6 review documents and assist with the prosecution of this litigation, including working on all the tasks
7 outlined in my initial declaration. If preliminary approval is granted, I believe the number of hours
8 spent will increase as I believe I will be contacted by Class Members with questions about the
9 settlement and/or settlement notice mailed out. Furthermore, I will spend additional time working with
10 my attorneys at final approval to submit further paperwork and help with monitoring compliance with
11 the distribution of all funds.

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

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

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DocuSigned by:
Patrick Wirth
Patrick Wirth...