

**FILED/ENDORSED**  
OCT 24 2022  
By: G. Galaviz  
Deputy Clerk

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Galen T. Shimoda (Cal. State Bar No. 226752)  
Justin P. Rodriguez (Cal. State Bar No. 278275)  
Brittany V. Berzin (Cal. State Bar No. 325121)  
**Shimoda & Rodriguez Law, PC**  
9401 East Stockton Boulevard, Suite 120  
Elk Grove, CA 95624  
Telephone: (916) 525-0716  
Facsimile: (916) 760-3733

Attorneys for Plaintiff BLAKE MCMAHON

**SUPERIOR COURT OF CALIFORNIA  
FOR THE COUNTY OF SACRAMENTO**

BLAKE MCMAHON, individually, and on  
behalf of all others similarly situated,

Plaintiff,

vs.

AIRCO MECHANICAL, INC., a California  
Corporation; and DOES 1 to 100, inclusive,

Defendants.

Case No. 34-2019-00259269

**CLASS ACTION**

**DECLARATION OF PLAINTIFF BLAKE  
MCMAHON IN SUPPORT OF MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION AND PAGA SETTLEMENT**

Reservation No. 2675831

Date: November 18, 2022  
Time: 9:00 a.m.  
Dept.: 25  
Judge: Hon. Jill H. Talley

Filed: June 25, 2019  
FAC Filed: September 19, 2019  
SAC Filed: May 20, 2020  
TAC Filed: April 23, 2021  
Trial Date: None Set

**BY FAX**

1 I, Blake McMahon, 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 declaration on behalf of myself, as a named plaintiff, and in support  
4 of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement.

5 2. I worked for Airco Mechanical, Inc. ("Defendant") from approximately July 25, 2017 to  
6 May 23, 2019, as a non-exempt employee. I was subject to all of Defendant's policies and practices  
7 that have been alleged as unlawful in the Complaint and the notice sent to the Labor and Workforce  
8 Development Agency, including the following: failure to pay overtime, failure to pay minimum wages,  
9 failure to provide accurate wage statements, and failure to provide meal and rest periods or pay  
10 premiums in lieu thereof.

11 3. I have actively participated in the litigation of this case. I have given a detailed account  
12 of all the facts related to my employment and the claims asserted in the Complaint. I provided  
13 extensive documentation in support of the claims brought against Defendant including paystubs,  
14 Defendant's policies, and other documents related to my work with Defendant and to the claims  
15 brought in the class action. I met with and assisted my attorneys in understanding the documents and  
16 providing context for Defendant's payroll process as it applied to me and how I believed it applied to  
17 Defendant's other employees.

18 4. My attorneys explained to me the risks and benefits of bringing a class action and a  
19 claim under the Private Attorneys General Act. I understood that I took on the risk, both professionally  
20 and financially, in pursuing the case as a class and representative action rather than pursuing my claims  
21 individually. I understood that pursuing the case as a class action meant that it would take substantially  
22 longer than pursuing a claim with the California Labor Commissioner and that I risked getting nothing  
23 in the end, but I believed it was important to make sure that Defendants followed the law for everyone.

24 5. I maintained communication with my attorneys throughout the litigation, discussing the  
25 facts and policies at issue in the case with Shimoda & Rodriguez Law, PC. I asked questions when I  
26 needed clarification about various aspects of this case to make sure there were continually steps taken  
27 to advance the interests of the class. I also understood that the recovery in this case was for the benefit  
28 of my fellow coworkers, not just for me. When my attorneys contacted me asking for more

1 information or documents related to the case, I made myself available and tried to give or obtain any  
2 additional information I could. I participated in the negotiations and settlement discussions in this case,  
3 including participating in mediation by phone, speaking with my attorney to answer questions,  
4 providing any additional information to assist at mediation and the post-mediation negotiations, and  
5 discussing the potential terms of the Agreement to evaluate its adequacy.


6 6. I have reviewed the final Joint Stipulation of Class Action and PAGA Settlement and  
7 Release, discussed the terms with my attorneys, and asked my attorney any questions I had. I believe  
8 the settlement terms and allocations are fair and reasonable given the facts of the case.

9 7. As a Class Representative, I took on the risk of having to pay Defendant's costs if we  
10 were unsuccessful in bringing our claims.

11 8. I understand that any Class Representative Enhancement Payment I may receive is for  
12 my participation as a Class Representative and it is not contingent on my support or approval of the  
13 Agreement. I do not believe I have any conflicts with any Class Members.

14 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
15 true and correct. Executed this 24 of October 2022 in Sacramento, California.

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DocuSigned by:  
  
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Blake McMahon