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12 *Attorneys for Plaintiffs and Class Members*

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SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA

12 **CHARLES CASTILLO and DEIDRE BEAN,**
13 individually and on behalf of all others similarly
14 situated,

15 Plaintiffs,

16 vs.

17 **HOLY NAMES UNIVERSITY,** a California
18 Non-Profit Corporation,

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20 Defendant.
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Case No.: HG21097245

**DECLARATION OF CHARLES CASTILLO
IN SUPPORT OF PLAINTIFFS' MOTION
FOR ORDER GRANTING FINAL
APPROVAL AND MOTION FOR APPROVAL
OF ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS FOR CLASS
REPRESENTATIVES**

Date: May 2, 2023
Time: 3:00 p.m.
Dept.: 23
Hon. Brad Seligman

1 I, Charles Castillo, declare as follows:

2 1. I am over the age of 18 and have personal knowledge of the facts set forth in this
3 declaration and could and would testify competently to them if called upon to do so in court.

4 2. I am one of the named Plaintiffs and PAGA Representatives in the above-referenced
5 action.

6 3. I submit this Declaration in support of Plaintiffs' Motion for Order Granting Final
7 Approval of the Class Action Settlement and Motion for Approval of Attorneys' Fees, Costs, and Service
8 Awards for Class Representatives.

9 4. I was employed by Holy Names University ("HNU") as a part-time adjunct instructor
10 during the Spring 2019 semester, and as a full-time instructor between approximately August 2019 and
11 May 2020.

12 5. I first spoke to my attorneys in or about April 2021. During our initial conversation, we
13 discussed my employment at HNU, my compensation structure when I worked a full-time instructor and
14 when I worked as a part-time adjunct instructor, the courses I taught, the period during which I worked
15 and taught remotely for HNU and the expenses I incurred in doing so. After discussing my potential
16 claims with my attorneys, I agreed to act as a Class and PAGA representative.

17 6. I carefully reviewed a representation agreement that included a description of the
18 obligations I was agreeing to take on in representing the class. I believe that I have maintained the best
19 interests of the Class Members and Aggrieved Employees in mind throughout this case. I devoted
20 substantial time and effort assisting my attorneys with this case including the following: discussing my
21 claims with my attorneys during our initial conversation, as discussed above, and as the case progressed;
22 searching for and providing documents to my attorneys upon their requests; assisting my attorneys with
23 preparing the PAGA Notice and the initial Complaint; reviewing case documents, and participating in
24 other ways as discussed in further detail below.

25 7. It took me approximately three hours to look through my files and travel to HNU to obtain
26 physical copies of my pay stubs, which my attorneys asked me to send to them. I had to travel to HNU
27 because I did not have electronic access to my pay stubs as I was no longer employed by HNU at this
28 time.

8. Very shortly after the Complaint was filed, Defendant served a Notice of Deposition on
me along with a request for production of documents. I discussed with my attorneys what to expect at a
deposition and what documents I needed to gather in response to the request for production. Although
Defendant ultimately withdrew the deposition notice, I spent approximately 45 minutes speaking with
my attorneys, and approximately one hour obtaining documents in response to HNU's requests.

1 9. As the case continued, I regularly corresponded with my attorneys by phone and email, as
2 they provided updates about the case.

3 10. Prior to the mediation, my attorneys sent the mediation brief that they submitted on my
4 behalf (and on behalf of the other lead Plaintiff) to me, which I reviewed carefully to make sure I agreed
5 with everything it stated.

6 11. I attended the mediation from the beginning, which was 9:30 a.m. and for approximately
7 2 hours, with a brief break in the middle because I had to attend to my work. After I left the mediation
8 session, I made sure to be available by phone until the mediation ended, as my attorneys asked me to do.

9 12. After the mediation ended, my attorneys informed me that the case did not settle but that
10 the mediator made a mediator's proposal. My attorneys explained to me what a mediator's proposal
11 meant, how the process worked, and the proposed terms, and I ultimately approved accepting the
12 mediator's proposal.

13 13. In the weeks that followed, I communicated with my attorneys about the preparation of
14 the formal settlement agreement. I carefully reviewed the agreement and discussed it with my attorneys
15 prior to signing it. This took approximately one hour.

16 14. After the formal settlement agreement was signed, I continued to stay in touch with my
17 attorneys about the state of approval papers, the scheduling of the settlement approval hearing, the delay
18 in the sending of the notice, and the scheduling of the final approval hearing.

19 15. I also talked to my attorneys regarding the contents and purpose of this declaration, and
20 reviewed it before signing to ensure its accuracy.

21 16. In sum, I devoted a lot of time and effort to this case and to the benefit of the Class. I
22 estimate that in total I spent between 13 and 14 hours participating in and assisting my attorneys with
23 this case.

24 I declare under penalty of perjury under the laws of the United States and the State of California
25 that the foregoing is true and correct. Executed on April ³__, 2023.

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Charles Castillo