

**EXHIBIT LIST
BEFORE THE HEARING EXAMINER
CITY OF SEATTLE**

<p>In the Matter of the Appeals of</p> <p>BAJA CONCRETE USA CORP. et. al.</p> <p>from a Final Order of the Director, Seattle Seattle Office of Labor Standards</p>	<p>Hearing Examiner File: LS-21-002, LS-21-003, LS-21-004</p> <p>Department Reference: 2020-00186-LS</p> <p>EXHIBIT LIST</p>
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Exhibit #	Offered By	Admitted?	Description
1	Department	Y	Paycheck Stubs – Ivan Ponce Redacted (City Exhibit 23)
2	Appellant Baja	Y	Statement of Ponce (Appellant Baja Exhibit 158)
3	Department	Y	Paycheck Stubs – Matias Catalan ToroE (City Exhibit 18)
4	Department	Y	Newway Safety Sign in Sheets 2019 (City Exhibit 130)
5	Department	Y	Matias Catalan Toro Deposition dated February 17, 2023 (City Exhibit 30)
6	Department	Y	Matias Catalan Toro Deposition Corrections dated March 15, 2023 (City Exhibit 31)
7	Department	Y	Newway Safety Sign-In Sheet dated March 21, 2019 (City Exhibit 10)
8	Department	Y	Newway Safety Sign in Sheet dated July 15, 2019 (City Exhibit 145)
9	Department	Y	Newway Safety Sign in Sheet dated December 18, 2018 (City Exhibit 148)
10	Department	Y	Timecards – Hector Cepedes (Appellant Baja Exhibit 134)
11	Department	Y	Paycheck Stubs – Alejandro Fiol (City Exhibit 14)

Examiner:	Ryan Vancil
Assistant:	Angela Oberhansly
Date:	June 12, 13, 14, 15, 20, 21, August 16, 17, 22, 23, 28, 29, 30, and September 20, 2023
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12	Department	Y	Baja Invoices and Timesheets dated December 30, 2018 – December 28, 2019 (City Exhibit 35)
13	Department	Y	Baja Invoices and Timesheets dated February 2, 2018 – December 22, 2018 (City Exhibit 34)
14	Department	Y	Paycheck Stubs – Hector Cespedes Rivera (City Exhibit 17)
15	Department	Y	Payroll Information (Appellant Baja Exhibit 102)
16	Appellant Baja	Y	Timecards 3 (Appellant Baja Exhibit 119)
17	Department	Y	Paycheck Stubs – Claudio Gamboa (City Exhibit 16)
18	Department	Y	Paycheck Stubs – Angel Gomez Chavez (City Exhibit 24)
19	Department	Y	Paycheck Stubs – John Hinestroza Diaz (City Exhibit 15)
20	Department	Y	Baja USA Business Card (Appellant Newway Exhibit 2 & Appellant Machado Exhibit 23)
21	Department	Y	Baja Concrete's Responses to Appellant Machado's Requests for Admission dated February 22, 2022 (Appellant Machado Exhibit 31)
22	Department	Y	Timecards 2 (Appellant Baja Exhibit 118)
23	Department	Y	Timecards – Jose Acosta (Appellant Baja Exhibit 137)
24	Department	Y	Paycheck Stubs – Jose Acosta Caballero (City Exhibit 22)
25	Department	Y	W4 Jose Acosta Caballero (City Exhibit 115)
26	Department	Y	Paycheck Stubs – Patricio Fernandez Borquez (City Exhibit 19)
27	Department	Y	Timecards – Patricio Fernandez (Appellant Baja Exhibit 146)
28	Department	Y	Paycheck Stubs – Jose Estrada Parra (City Exhibit 21)
29	Appellant Baja	Y	Timecards 1 (Appellant Baja Exhibit 117)
30	Appellant Baja	Y	Invoices from Baja Canada (Appellant Baja Exhibit 100 & City Exhibit 37)
31	Appellant Newway	Y	Soto Email re Payroll dated January 30, 2018 (Appellant Baja Exhibit 5)
32	Appellant Newway	Y	Baja Responses to OLS RFI (City Exhibit 42)
33	Department	Y	Baja Articles of Incorporation (City Exhibit 93)

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34	Department	Y	Baja Certificate of Registration (City Exhibit 98)
35	Department	Y	Baja Complaint v Newway KCSC Case 22-2-04760-7 (City Exhibit 43)
36	Department	Y	Email – Forler-Grant to Claudia dated December 31, 2020 (City Exhibit 79)
37	Department	Y	DeArmas Dep. – Baja Concrete USA 30(b)(6) 04262022 (City Exhibit 3)
38	Department	Y	Paystubs Claudia Penunuri (Appellant Baja Exhibit 50)
39	Department	Y	Baja Response to City’s Request to Admissions
40	Department	Y	Email Forler-Grant Baja Payments February 11, 2020 (City Exhibit 87)
41	Department	Y	Forler-Grant Dep.-Newway Forming CR 30(b)(6) May 5, 2022 (City Exhibit 1)
42	Appellant Baja	Y	Newway Organizational Chart 2 Seattle-OLS2247 (Appellant Baja Exhibit 124)
43	Appellant Baja	Y	Baja Invoices and Timesheets 01132020-07112020 (City Exhibit 36)
44	Appellant Newway	Y	Email from K. Grant to Roberto, January 2, 2019, page 1 only, (Appellant Newway Exhibit 6)
45	Appellant Newway	Y	Email from K. Grant to Roberto, September 16, 2019 (Appellant Newway Exhibit 7)
46	Department	Y	Machado OLS Interview Notes (City Exhibit 25)
47	Department	Y	Antonio Machado Dep. 02012022 (City Exhibit 2)
48	Department	Y	Paystub – Machado \$4878 (City Exhibit 78)
49	Department	Y	Claudio Gamboa OLS Interview Notes (redacted) 01292020 (City Exhibit 137)
50	Department	Y	Matias Catalan OLS Interview Notes 02192020 (City Exhibit 139)
51	Department	Y	Angel Gomez Chavez OLS Interview Notes 03082020 (City Exhibit 140)
52	Department	Y	Final Calculations Excel Spreadsheet (Appellant Machado Exhibit 25)
53	Department	Y	Paycheck Stubs – Cristhian Pelaez Ruiz (City Exhibit 13)
54	Department	Y	Paycheck Stubs – Luis Andres Arriagada (City Exhibit 20)
55	Department	Y	Paycheck Stubs – Antonio Yevenes (City Exhibit 46)
56	Department	Y	Paycheck Stubs – Bulfrano Brito (City Exhibit 47)

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57	Department	Y	Paycheck Stubs – Cristian Navejas (City Exhibit 48)
58	Department	Y	Paycheck Stubs – David Giron (City Exhibit 49)
59	Department	Y	Paycheck Stubs – David San Roman (City Exhibit 50)
60	Department	Y	Paycheck Stubs – Diego Rojas Villaseca (City Exhibit 51)
61	Department	Y	Paycheck Stubs – Edison Chimborazo (City Exhibit 52)
62	Department	Y	Paycheck Stubs – Emeterio Collins Lopez (City Exhibit 53)
63	Department	Y	Paycheck Stubs – Evelio Alvarez Ruiz (City Exhibit 54)
64	Department	Y	Paycheck Stubs – Gabriel Rios Ortiz (City Exhibit 55)
65	Department	Y	Paycheck Stubs – Gerardo Guzman (City Exhibit 56)
66	Department	Y	Paycheck Stubs – Gerardo Valencia (City Exhibit 57)
67	Department	Y	Paycheck Stubs – Israel Avila Gasca (City Exhibit 58)
68	Department	Y	Paycheck Stubs – Javier Alfaro Perez (City Exhibit 59)
69	Department	Y	Paycheck Stubs – Jesus Ramon Castro (City Exhibit 60)
70	Department	Y	Paycheck Stubs – Jose Alvarez Rodriguez (City Exhibit 61)
71	Department	Y	Paycheck Stubs – Jose Vega Hernandez (City Exhibit 62)
72	Department	Y	Paycheck Stubs – Josue Osuna Tallabas (City Exhibit 63)
73	Department	Y	Paycheck Stubs – Julio Caballero Pacheco (City Exhibit 64)
74	Department	Y	Paycheck Stubs – Lucas Ayala Redacted (City Exhibit 65)
75	Department	Y	Paycheck Stubs – Luis Fernandez Rosas (City Exhibit 66)
76	Department	Y	Paycheck Stubs – Luis Garcia Redacted (City Exhibit 67)
77	Department	Y	Paycheck Stubs – Manuel Camus Valdes (City Exhibit 68)
78	Department	Y	Paycheck Stubs – Marco Villasenor Harbolte (City Exhibit 69)
79	Department	Y	Paycheck Stubs – Martin Ayala Ochoa (City Exhibit 70)
80	Department	Y	Paycheck Stubs – Miguel Alfaro Pinto (City Exhibit 71)
81	Department	Y	Paycheck Stubs – Noe Rios Estrada (City Exhibit 72)

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82	Department	Y	Paycheck Stubs – Ramon Duenas Gomez (City Exhibit 73)
83	Department	Y	Paycheck Stubs – Raul Hiraes Cuevas (City Exhibit 74)
84	Department	Y	Paycheck Stubs – Roberto Hiralez Colin (City Exhibit 75)
85	Department	Y	Paycheck Stubs – Roberto Lopez Hernandez (City Exhibit 76)
86	Department	Y	Paycheck Stubs – Ruben Gonzalez (City Exhibit 77)
87	Department	Y	OLS Final Order – issued 08252021 (City Exhibit 11)
88	Department	Y	OLS Subpoena Duces Tecum 07162020 (City Exhibit 108)
89	Department	Y	Baja Annual Report SOS (City Exhibit 97)
90	Department	Y	Newway & Machado NOI & RFI (City Exhibit 105)
91	Appellant Newway	Y	Newway OLS Response (Appellant Newway Exhibit 40)
92	Department	Y	Email Casa Latina to OLS 1/10/2020 (Appellant Newway Exhibit 11)
93	Department	Y	Calculations Final Combined (City Exhibit 119)
94	Department	Y	Final Calculations Excel Spreadsheet (Appellant Machado Exhibit 26)
95	Department	Y	Baja USA Deductions and Contributions (City Exhibit 38)
96	Department	Y	Baja Payroll Summary – June 2020 (City Exhibit 39)
97	Department	Y	Baja Payroll Summary – July 2020 (City Exhibit 40)
98	Department	Y	Baja Payroll Summary – August 2020 (City Exhibit 41)
99	Department	Y	Email Forler-Grant Baja Sign In 09182019 (City Exhibit 85)
100	Appellant Baja	Y	Emails Baja – Seattle (Appellant Baja Exhibit 116)
101	Appellant Baja	Y	Appellant Baja Exhibits 6, 7-22,33, 36, 38, 40, 41, 43, and 44
102	Appellant Baja	Y	Appellant Baja Exhibits 8, 23, 24-32, 34, 35, 37, 39, and 42 (emails only)
103	Department	Y	De Armas Affidavit (for deposition) 04262022 (City Exhibit 4)
104	Department	Y	Email Mercedes De Arma Workers Comp 06182020 (City Exhibit 90)

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105	Department	Y	De Armas Deposition (individual) 05112022 (City Exhibit 8)
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