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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

BRENDA GARCIA, an individual, on behalf
of herself and others similarly situated

PLAINTIFF,

v.

TITANIUM ALARM, LLC; and DOES 1 thru
50, inclusive,

DEFENDANTS.

CASE NO. CIVDS2013199

[Case Assigned for All Purposes to Hon. David
Cohn in Dept. S-26]

**DECLARATION OF BRENDA GARCIA
IN SUPPORT OF FINAL APPROVAL OF
CLASS SETTLEMENT**

Date: October 3, 2022

Time: 10:00A.M.

Dept.: S-26

Complaint Filed: May 29, 2020

Trial Date: None Set

DECLARATION OF BRENDA GARCIA

I, BRENDA GARCIA, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant TITANIUM ALARM, LLC (“Titanium” or “Defendant”) as an hourly employee.

3. I brought this lawsuit, on behalf of myself and all other Class Members, against Defendant because I believe that Titanium did not pay wages and/or overtime, pay timely wages, and pay wages upon termination to me and other employees, among other violations.

4. I understand that I am representing other employees and I believe that I am able to represent them well.

5. I first researched experienced attorneys who are very experienced with these types of lawsuits. Once retained, I compiled relevant documents from my employment to assist my attorneys in litigating this case. I worked with my attorneys to develop the facts and legal claims in this lawsuit. The lawsuit was filed on May 29, 2020.

6. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the Settlement as needed. Additional work in connection with this matter includes providing information to my attorneys regarding my employment with Defendant, staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my attorneys’ various communications regarding this matter, being available for and responsive to counsel during the full-day mediation on June 24, 2021; and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of the Class Members.

7. I estimate the total time spent in connection with this matter is approximately 20-25 hours.

8. I have worked to actively represent the other Class Members and their interests.

9. I have always kept the Class Members interests at heart in this litigation.

1 10. I am prepared to continue assisting with this litigation and am committed to
2 achieving the best possible results for the Class Members.

3 11. I believe that the class action settlement obtained on behalf of the Class Members
4 is fair and reasonable in light of the issues involved in this case. As mentioned above, I reviewed
5 and discussed the Settlement with my attorneys and asked them questions about it to ensure that I
6 understood its terms and what it would mean for all of the Class Members.

7 12. I believe that I have fairly represented the absent Class Members and request that
8 the Court finally approve this settlement and confirm me as Class Representative.

9 13. I am not aware of any conflicts of interest that prevent me from being confirmed as
10 Class Representative in this Lawsuit. I am not related in any way to my attorneys or to any other
11 member of the firm that is representing me. I have no business dealings or other involvement
12 beyond this lawsuit and this representation. I have not been promised any money or inducement
13 to serve as Class Representative in this Lawsuit.

14 14. It is my opinion that the settlement agreement provides for a fair and adequate
15 enhancement for me as a Class Representative, in the amount of \$5,000.00. I believe that this is
16 fair and reasonable in light of all of the work that I have performed in my role as Class
17 Representative. As Class Representative, I have actively participated in all stages of the litigation,
18 as detailed above, and have always maintained the best interests of the Class Members while
19 performing my Class Representative duties.

20 ///

21 ///

22 ///

Executed this 3rd day of September, 2022 at West Covina,
(City)
California.

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DECLARATION OF BRENDA GARCIA IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT

(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On September 8, 2022, I served all interested parties in this action the following documents described as: **DECLARATION OF BRENDA GARCIA IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

John K. Rubiner Michelle T. Harrington Matthew S. Jones jrubiner@fmglaw.com mharrington@fmglaw.com mjones@fmglaw.com Freeman Mathis & Gary, LLP 550 South Hope Street, 22nd Floor Los Angeles, CA 90071-2627	Walter L. Haines admin@uelglaw.com UNITED EMPLOYEES LAW GROUP, PC 4276 Katella Avenue, Suite #301 Los Alamitos, CA 90720
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[XX] BY ELECTRONIC MAIL TRANSMISSION: I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 8, 2022, at Woodland Hills, California.



Michelle Tanzer