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Attorneys for Plaintiff CARLA COLLINS
 and the Certified Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CARLA COLLINS on behalf of herself, and
 all others similarly situated, and all aggrieved
 employees,

Plaintiff,

v.

NATIONAL INSURANCE INSPECTION
 SERVICES, INC.; and DOES 1 through 50,
 inclusive,

Defendants.

Case No: 20STCV15619

CLASS AND REPRESENTATIVE ACTION

Assigned to
Honorable Elaine Lu, Dept. 9

**DECLARATION OF CARLA COLLINS
 IN SUPPORT OF MOTION FOR FINAL
 APPROVAL OF CLASS AND PAGA
 ACTION SETTLEMENT AND MOTION
 FOR AWARD OF REASONABLE
 ATTORNEYS' FEES AND COSTS, CLASS
 REPRESENTATIVE INCENTIVE
 AWARD/ GENERAL RELEASE
 PAYMENT, AND SETTLEMENT
 ADMINISTRATION COSTS**

Date: January 22, 2026
 Time: 10:00 a.m.
 Dept. 9

Motion Due: December 22, 2025
 Opposition Due: January 2, 2026
 Reply Due: January 8, 2026

Complaint Filed: April 22, 2020
 FAC Filed: June 24, 2020
 Trial: Not Set

1 I, CARLA COLLINS, declare as follows:

2 1. I am the representative Plaintiff in this action against National Insurance
3 Inspection Services, Inc. ("NIIS" or "Defendant"). I have personal knowledge of the facts stated
4 herein and, if called as a witness, I could and would testify competently to the facts set forth
5 below. I submit this Declaration in support of the Plaintiff's Motion for Final Approval of Class
6 and PAGA Settlement and Motion for Award of Reasonable Attorneys' Fees and Costs, Class
7 Representative Incentive Award/General Release Payment, and Settlement Administration
8 Costs. I am a competent adult, I have personal knowledge of the facts set forth in this
9 declaration, and I could and would testify competently under oath if called as a witness.

10 2. I performed services for Defendant as a purported independent contractor real
11 property inspector from approximately October 2019 through April 2020 in Los Angeles County.

12 3. I believe that I and other purported independent contractor real property inspectors
13 should have been classified as employees. I also believe it was wrong for Defendant to not pay
14 us for all our hours work, not pay overtime, not provide us with meal and rest breaks, and not
15 reimburse us for our business expenses incurred in the course of performing inspections on
16 Defendant's behalf.

17 4. When I decided to bring this action, I first spoke with my attorney Robert Spencer,
18 Esq. of Keller Grover LLP. We discussed Keller Grover LLP's extensive experience litigating
19 employment cases. I spent over an hour and a half describing to him the facts of my case. We
20 also discussed in-depth the process of class action litigation as well as my responsibilities as a
21 class representative. We also discussed that the case would be brought as a "PAGA"
22 representative action under the Labor Code Private Attorneys' General Act of 2004, Labor Code
23 §§ 2698, *et seq.*

24 5. I also spent several days searching for documents that would aid my attorneys in
25 this case. After I found these documents, I had additional telephone calls with Mr. Spencer to
26 discuss them and how they affect the case.

27 6. Prior to filing the complaint, I spent an hour with Mr. Spencer working on the
28 PAGA exhaustion letter that was sent to the State of California. I understand that I was required

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to send this letter to the State of California in order to bring the PAGA causes of action. I also spent approximately 30 minutes reviewing the PAGA letter to make sure it was accurate.

7. It is important to note that after my attorneys sent the PAGA letter to the LWDA and Defendant, I stopped receiving work assignments from Defendant.

8. My attorneys filed the complaint on April 22, 2020 and I reviewed it with Mr. Spencer. I also spent approximately an hour and a half reviewing the complaint at home prior to it being filed. My attorneys filed the operative first amended complaint adding PAGA claims on June 24, 2020. I also spent time with Mr. Spencer reviewing the first amended complaint as well as reviewing it on my own before it was filed.

9. The Parties held the first mediation in this case on April 21, 2022 and it was unsuccessful. This mediation was delayed numerous times due to the pandemic. As part of this mediation, I had many telephone conversations with Mr. Spencer to answer any questions that he had. I also made sure I was available on the date of the mediation.

10. I participated in discovery in this case. I was deposed on May 23, 2023 for the entire day, and also had to prepare for my deposition the day before. As part of this deposition, Defendant propounded a document request containing 48 requests for production. I spent days searching for documents responsive to Defendant's requests and produced over 100 pages.

11. My attorneys and I then discussed our motion for class certification. Mr. Spencer and I discussed the briefing schedule and when the hearing would be held. I also submitted a declaration as part of the briefing, I worked on this for about an hour with Mr. Spencer and spent about another hour at home reviewing it before it was signed. We also discussed that Defendant would be deposing certain class members. Mr. Spencer kept me up to date on the briefing and when the hearing would be held. After the hearing, Mr. Spencer provided me with the Court's order conditionally granting class certification. We discussed what this meant and Mr. Spencer and I also discussed that the Court ordered us to submit additional briefing and a revised trial plan.

12. After the Court granted conditional class certification, the Parties agreed to a second mediation and the Court continued the additional briefing regarding class certification.

The second mediation took place on September 23, 2023 was also unsuccessful. As part of this process I had several telephone conversations with Mr. Spencer and I also made sure I was available on the date of the mediation.

13. My attorneys then submitted our revised trial plan and supplemental briefing regarding class certification. After the Court granted class certification, Mr. Spencer provided me with a copy of the order and we discussed what that meant and the next steps in the case.

14. After the Court granted class certification, the Court set this case for trial. I discussed this with Mr. Spencer and made sure I would be available to testify and attend trial if it reached that point. The trial date was eventually vacated so the Parties could mediate this action a third time.

15. The parties then participated in a third mediation that took place on January 22, 2025. As with the prior mediations, I again had numerous telephone calls with Mr. Spencer. I also made sure that I was available on the date of the mediation to answer any questions Mr. Spencer might have. This third mediation was successful.

16. After the third mediation the parties prepared a memorandum of understanding (“MOU”) detailing the main points of the settlement. I spent approximately half an hour with Mr. Spencer discussing the MOU and then spent approximately half an hour reviewing the MOU at home prior to it being filed.

17. When the formal settlement agreement was ready, I spent another hour speaking with Mr. Spencer regarding the settlement, whether it was fair, and the plan of distribution. I also spent approximately two hours reviewing the settlement agreement before I signed it.

18. Mr. Spencer also kept me up to date regarding the preliminary approval process, including that the Court requested additional briefing. To address Court’s concerns, the parties amended the settlement agreement. I spent approximately an hour with Mr. Spencer discussing the supplemental briefing, the amendments to the settlement agreement, as well as drafting, reviewing, and submitting a declaration in support of preliminary approval.

19. Throughout this litigation, I have had regular telephone conversations with Mr. Spencer regarding this case, we speak about once a month. I often telephone Mr. Spencer to see

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how the case is going and ask whether there is anything that I need to do. I also receive regular telephone calls from Mr. Spencer updating me on the progress of the case.

20. When I agreed to act as a named plaintiff/Class Representative, I understood that I might be responsible for some of the costs incurred by Defendant if the lawsuit was unsuccessful. In addition to this, I worried about my reputation in the community if people were to find out I had sued somebody. I even lost a couple of friendships over this case.

21. I also am concerned about the possible repercussions to my future job opportunities because I have been a plaintiff in a class action wage and hour lawsuit.

22. I understood from the beginning that I was pursuing this case not only for my own benefit, but for the benefit of large numbers of past and present real property inspectors who either were not aware of their rights or were too afraid of retaliation to complain.

23. I believe that the settlement reached in this case is fair and, in light of the risks involved, will justly compensate the real property inspectors who were and are affected by the violations that were the subject of the action.

24. I believe that my proposed incentive award that I have requested is fair in light of all the work I did in this case against NIIS. I further believe my proposed incentive award is fair considering the work I put into the case, the risks I took, the harm that I believe my being involved in a wage an hour lawsuit could cause me in terms of future job prospects, and the benefits that have been achieved for the class members. I have also given a general release of my claims.

25. I have no interest or involvement with the settlement administrator Phoenix Settlement Administrator.

26. I have no interest or involvement in the governance or work of St. Jude's Children's Research Hospital.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this Declaration was executed on 12/6/2025 at Los Angeles, California.

Carla Olivia Collins
 CARLA COLLINS

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PROOF OF SERVICE

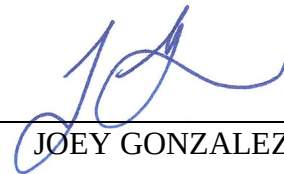
I, JOEY GONZALEZ, am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1965 Market Street, San Francisco, California 94103. On **December 22 2025**, in the case of *Collins v. National Insurance Inspection Services, Inc.* Los Angeles Superior Court Case Number 20STCV15619, I served the foregoing document(s):

DECLARATION OF CARLA COLLINS IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT AND MOTION FOR AWARD OF REASONABLE ATTORNEYS' FEES AND COSTS, CLASS REPRESENTATIVE INCENTIVE AWARD/ GENERAL RELEASE PAYMENT, AND SETTLEMENT ADMINISTRATION COSTS

on the interested party(ies) below, using the following means:
 interested party(ies) below, using the following means:

Jeffrey McClure, Esq. Anne Kelson Hummel, Esq. DAVENPORT GERSTNER & MCCLURE, APC 2540 Camino Diablo, Suite 200 Walnut Creek California 94597 jeff@laborcounsel.com akh@laborcounsel.com	<i>Attorneys for Defendant</i> NATIONAL INSURANCE INSPECTION SERVICES, INC.
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☒	(BY ELECTRONIC SERVICE- Case Anywhere) by submitting an electronic version of the documents through the user interface at www.caseanywhere.com and by emailing a word version of the document to the above referenced email addresses.
☒	(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.


 JOEY GONZALEZ