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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 ROBERT W.
SPENCER IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND PAGA ACTION
SETTLEMENT**

Date: July 10, 2025
Time: 10:00 a.m
Dept. 9

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

1 I, ROBERT W. SPENCER, declare as follows:

2 1. I am an attorney duly admitted to the practice of law in the State of California and
3 before this Court. I am a senior associate with the law firm Keller Grover LLP, counsel for
4 Representative Plaintiff Carla Collins in this action. I have personal knowledge of the facts
5 stated herein and, if called as a witness, I could and would testify competently to the facts set
6 forth below.

7 2. Concurrently with the submission of the Settlement Agreement to the Court,
8 Plaintiff is submitting the settlement to the LWDA as required by Labor Code § 2699(l)(2). On
9 April 18, 2025, I personally uploaded the following documents to the LWDA website: (1) Notice
10 of Motion and Motion for Preliminary Approval of Class action and PAGA settlement and
11 Memorandum of Points and Authorities in Support thereof, (2) the Declaration of Eric A. Grover
12 in Support of Motion for Preliminary Approval of Class and PAGA Action Settlement, (3) the
13 proposed order, (4) the parties' Joint Stipulation of Class and Paga Action Settlement and
14 Release of Claims, and (5) this declaration.

15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct, and that this Declaration was executed on this 18th day of April,
17 2025, at San Francisco, California.

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19 

20 ROBERT W. SPENCER

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 **April 18, 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 ROBERT W. SPENCER IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT

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