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BLOWER-DEMPSAY CORPORATION

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

MEYBELL PEREZ, on behalf of herself and
all others similarly situated,

Plaintiff,

vs.

BLOWER-DEMPSAY CORPORATION, a
California corporation, LYNEER STAFFING
SOLUTIONS, LLC, a Delaware limited
liability company and DOES 1 through 50,
inclusive,

Defendant.

Case No. 30-2020-01140589CU-OE-CXC

CLASS ACTION

Hon. Melissa R. McCormick

DECLARATION OF MEYBELL PEREZ

DECLARATION OF MEYBELL PEREZ

I, Meybell Perez, declare as follows:

1. I am the Plaintiff and proposed Class Representative in the matter titled, *Meybell Perez v. Blower Dempsay Corporation* (“Blower Dempsay”), *Lyneer Staffing Solutions, LLC*, (“Lyneer Staffing”) No. 30-2020-01140589CU-OE-CXC. I know the facts declared herein to be true of my own personal knowledge and if called as a witness, I could and would competently testify thereto.

2. In or about December 2015, I was employed to work in Blower-Dempsay’s Pacific Western division through a staffing agency. On or about April 2018, I was employed by Lyneer Staffing and continued to work for Blower Dempsay through the end of my employment, on or about October 2019. During my employment with Defendants, I occupied a non-exempt, hourly position.

3. Prior to retaining the law firm of James Hawkins APLC, to redress the grievances that I had against Defendants, James Hawkins APLC informed me of the advantages and disadvantages of litigation, and of my responsibilities as both a Plaintiff and a Class Representative.

4. By deciding to litigate my claims as part of this class action, I agreed to pursue not only my own potential wage and hour claims, but the claims of all similarly situated employees, and to put the interests of the class ahead of my own. I pledged to participate actively in the lawsuit and have done so.

5. As a Class Representative, I am aware that I represent the interest of the class members in this litigation and of my fiduciary duty to the putative class members. I am not aware of any interests adverse to the interests of the proposed class members, and I am, and have been, committed to vigorously prosecuting the case on behalf of the class. I have adhered to my commitment and duty to the class including foregoing the opportunity to settle my individual claims against Defendants early on in this litigation.

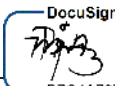
6. As a Class Representative, I continuously interacted with my attorneys to discuss the status of the case. I provided relevant oral and documentary information necessary to prosecute this case. By way of example, I searched for and provided relevant documents pertaining to my

1 employment with Defendant and engaged in multiple discussions with my attorneys regarding my
2 employment. Those discussions included, but were not limited to, the following topics: the policies,
3 practices and specific working conditions at Defendants. I have also had numerous discussions with
4 my attorneys regarding the progress of this case and assisted in preparation for and was available
5 during the mediation.

6 7. By agreeing to bring this action, I formally accepted the responsibilities of
7 representing the interests of class members in California. I also risked the potential stigma of being
8 the named plaintiff in a representative action labor dispute which could affect my further
9 employability in the industry or with any prospective employer who learns of my lawsuit against a
10 former employer.

11 8. The incentive payment for being a class representative, subject to court approval, is
12 Five Thousand Dollars (\$5,000). I believe that this amount is fair and reasonable in light of the efforts
13 and time I have put into this matter, and the risks of litigating this class action as a class
14 representative which has resulted in a very favorable outcome to the class members.
15

16 I declare under penalty of perjury under the laws of the state of California that the foregoing is
17 true and correct. Executed this 22nd day of September 2023, in Anaheim, California.

18 DocuSigned by:
19 
20 B7C4A797C940414...
Meybell Perez