

Dana Douglas, SBN 158548
The Douglas Law Group
13366 N. Meadow View Drive
Grass Valley, California 95945
Telephone: (530) 252-1301
Facsimile: (866) 927-0571

Attorneys for Defendant
AMERICAN CORPORATE SECURITY, INC.

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

RIBALDO OLIVERA, et al.,	)	CASE NO: 21STCV16417
	)	Assigned for all purposes to the Hon.
	)	Carolyn B. Kuhl, Dept. 12
Plaintiffs,	)	
	)	DECLARATION OF DANA DOUGLAS
v.	)	AND DINA THOMPSON IN SUPPORT
	)	OF MOTION FOR PRELIMINARY
	)	APPROVAL OF SETTLEMENT
AMERICAN CORPORATE SECURITY,	)	
INC., et al.,	)	Date: May 28, 2026
	)	Time: 10:30 a.m.
	)	Dept: SSC 12
Defendants.	)	

We, Dana Douglas and Dina Thompson, do hereby declare:

1. I, Dana Douglas, am an attorney at law, duly licensed to practice before all of the courts of the State of California and am the principal of The Douglas Law Group, attorneys of record for defendant, herein. I have personal knowledge of the following facts, and if called, I could and would competently testify thereto.

1 2. I, Dina Thompson, am the Chief Executive Officer of defendant, American
2 Corporate Security, Inc. I have personal knowledge of the following facts, and if called, I could
3 and would competently testify thereto.

4 No Conflict, Interest or Involvement With Class Action Administrator

5 3. Neither American Corporate Security, Inc., The Douglas Law Group, nor anyone
6 in our respective businesses have any conflict, interest or involvement in the governance or work
7 of Apex Class Action Administration, the agreed administrator in the instant action.

8 4. Furthermore, I, Dana Douglas, have been corporate counsel for Defendant,
9 American Corporate Security, Inc. since 2008, and have personal knowledge of its structure and
10 activities. Defendant American Corporate Security, Inc. has no interest or involvement in the
11 governance or work of Apex Class Action Administration, the administrator identified in the
12 settlement agreement and instant Motion.

13 No Pending Actions Except Related PAGA Action

14 5. There remains pending in this Court, but stayed without activity, a previous
15 related PAGA action with these same parties, entitled Olvera v. American Corporate Security,
16 Inc., bearing Civ. Case No. 21STCV26885 filed on or about July 22, 2021 (“related PAGA
17 action”), and pending in this Department. That case was duplicated and combined with the
18 instant matter when plaintiffs filed their First Amended Complaint with leave of court in the
19 instant action on or about September 28, 2022. Since that date there has been no activity in the
20 related PAGA action. That related PAGA action is coextensive with the PAGA claims in the
21 instant action, with the same plaintiffs making the same claims against the same defendant on
22 behalf of the same class. The claims in the related PAGA action will be extinguished with the
23 instant action. Indeed, if the related PAGA action claims are not extinguished and dismissed,
24 defendant will not complete settlement of the instant action. Both actions are resolved by the
25 settlement in the instant action.

26 6. Neither I, Dana Douglas, nor I, Dina Thompson, are aware of any other pending
27 class action, PAGA action, arbitration or other such matter asserting claims that will be
28 extinguished or adversely affected by the Settlement of the instant action.

English Only Notice Sufficient

7. Notice to class members is sufficient in English, only. All employees are required to be fluent in English. All communications with class members by management, supervisors, clients, client employees, independent truckers, law enforcement, longshoremen, and the public are done in English. Class members are required to make all communications during work hours and for work purposes in English. Fluency in English is a job requirement for all class members, and all interviews are conducted in English. I, Dana Douglas, at one point or another during my work as corporate counsel for defendant, have spoken with approximately 90% of the class members, and have observed that they can all speak fluent English. For the vast majority of the class members, English is their first, primary, and only language.

I, Dina Thompson, declare that the foregoing is true and correct under the laws of the State of California. Executed this 3rd day of April, 2026, at Long Beach, California.



Dina Thompson, Declarant
Chief Executive Officer, Defendant
American Corporate Security, Inc.

I, Dana Douglas, declare that the foregoing is true and correct under the laws of the State of California. Executed this 3rd day of April, 2026, at Grass Valley, California.



Dana Douglas, Declarant
Attorney for Defendant