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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF FRESNO**

EDUARDO GONZALEZ, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

GUARDIAN INDUSTRIES, LLC, a
Delaware corporation; and DOES 1 through
100,

Defendants.

Case No. 19CECG02134

*[Case assigned to the Hon. Rosemary McGuire,
Dept. 402]*

**DECLARATION OF LILY YANG ON
BEHALF OF GUARDIAN INDUSTRIES,
LLC**

Action Filed: June 20, 2019

DECLARATION

I, Lily Yang, declare as follows:

1. I am a Human Resources Business Partner for Guardian Industries, LLC ("Guardian"). I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. As part of an informal production prior to mediation, Guardian produced Plaintiff Eduardo Gonzalez's personnel file, timekeeping and payroll records, and relevant company policies in effect during Plaintiff's employment and the relevant period. I understand these records were Bates stamped "GUARD000001-000162."

3. Guardian also produced a random sampling of current and former putative class member timekeeping and payroll records from the relevant time period for mediation. I understand these records were Bates stamped "GUARD000163-002483."

4. The excel spreadsheet titled "Gonzalez v. Guardian - Class List (For Mediation Purposes Only)" contains the redacted list of putative class members from June 20, 2015 to April 16, 2020, including their employee number, employment status, hire date, termination date, department name, and job name.

I declare under penalty of perjury under the laws of the state of California and the United States that the foregoing is true and correct. Executed on Feb 3, 2021, in Fresno, California.


Lily Yang