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Attorneys for Plaintiff and Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SAN MATEO**

DON SARUBBI, as an individual and on
 behalf of all others similarly situated,

Plaintiffs,

vs.

TECH MAHINDRA (AMERICAS) INC.,
 a New Jersey corporation; TECH
 MAHINDRA NETWORK SERVICES
 INTERNATIONAL, INC., a Delaware
 corporation; TECH MAHINDRA
 TECHNOLOGIES INC., a Delaware
 corporation; TECH MAHINDRA
 NETWORK SERVICES, a business
 organization, form unknown; and DOES 1
 through 50, inclusive,

Defendants.

Case No.: 20-CIV-03616

(Assigned to the Hon. Robert D. Foiles, Dept. 21)

**DECLARATION OF DON SARUBBI IN
 SUPPORT OF PLAINTIFF'S RENEWED
 MOTION TO APPROVE SETTLEMENT
 AGREEMENT PURSUANT TO THE
 PRIVATE ATTORNEYS GENERAL ACT**

Date: February 4, 2022

Time: 2:00 p.m.

Dept.: 21

Complaint Filed: August 26, 2020

DECLARATION OF DON SARUBBI

I, Don Sarubbi, declare as follows:

1. I am an individual over the age of 18. I am the named Plaintiff in the above-referenced action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I worked for Defendants as a temporary services employee from about March 30, 2020, until about June 10, 2020.

3. During my employment, I was routinely paid wages on a semi-monthly basis. However, as a temporary services employee, I should have been paid on a weekly basis. Defendants also routinely paid me late. As an example, during the pay period of April 16, 2020 to April 30, 2020, I was not paid my wages for that period until May 15, 2020.

4. I understand that the claims alleged in this action were brought on behalf of other aggrieved employees. I do not believe I have any interests that are adverse to the other employees that are part of the PAGA settlement.

5. I have spent a significant amount of time discussing this matter with my attorneys on many occasions and explaining my understanding of Defendants' practices. To date, I have performed a number of tasks in my role as the representative, including the following:

a. Discussing the case and the facts involved with my attorneys on several occasions, including telephonic discussions at various stages of the lawsuit;

b. Gather documents related to the case;

c. Reviewing and submitting my PAGA letters to the LWDA; and

d. Reviewing pleadings in this case, including the PAGA complaint, the settlement agreement, and my declaration.

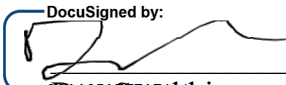
6. I have also entered into a general release of all known and unknown claims against Defendants in entering into this settlement.

7. I have reviewed the PAGA settlement agreement and I believe that the settlement is in the best interest of all aggrieved employees part of the settlement. I believe the settlement to be reasonable and fair, and adequately compensates the aggrieved employees who are part of

1 the settlement for the claims alleged in the complaint.

2 8. I am proud of the result and accomplishment of this lawsuit. I feel that it is a
3 positive accomplishment and understand that other people will benefit because of the actions that
4 I have taken.

5 I declare under penalty of perjury that the foregoing is true and correct. Executed on
6 January ⁷__, 2022, at Union City, California.

7 DocuSigned by:
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