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Attorneys for Plaintiff and the Class

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

TARA JOY, as a private attorney general and as
an individual and on behalf of all others similarly
situated,

Plaintiffs,

vs.

CONTROL AIR ENTERPRISES LLC, a
Delaware limited liability company; CONTROL
AIR CONDITIONING CORP., a California
corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 30-2020-01155488-CU-OE-CXC

[Hon. Lon F. Hurwitz, Department CX103]

**DECLARATION OF TARA JOY IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: August 25, 2023
Time: 1:30 p.m.
Department: CX103

1 I, Tara Joy, declare as follows:

2 1. I am an individual over the age of 18. I am the named plaintiff in the above-reference
3 action. I have personal knowledge of the facts set forth below, except as to those matters stated on
4 information and belief and, as to those matters, I believe them to be true. If called as a witness, I could
5 testify competently as to the matters stated in this declaration.

6 2. In October of 2014, I began working for Control Air Conditioning Corporation. I am
7 informed and believe my employment with Control Air Conditioning Corporation ended on May 31,
8 2019. When my employment with Control Air Conditioning Corporation ended, I was not paid my
9 accrued paid time off (“PTO”). I also am informed and believe that as of June 1, 2019, Control Air
10 Enterprises LLC became my employer. I was provided wage statements that did not show the name and
11 address of Control Air Enterprises LLC. Instead, I received wage statements that show only “CAE Non
12 Union PR,” without any address.

13 3. During the pendency of this lawsuit, I have done my best to represent the interests of the
14 employees that are part of the class. I have actively contributed to the litigation of this case, including by
15 providing information after the start of the litigation that enabled my attorneys to identify and allege the
16 additional claims for waiting time penalties based on the transition of my and others’ employments from
17 Control Air Conditioning Corporation to Control Air Enterprises LLC. My contributions include but are
18 not limited to (i) participating in numerous telephonic meetings with my attorneys and their staff to
19 discuss the case and review documents prepared on my behalf, (ii) providing my attorneys with
20 information and documents regarding my employment with Defendant, (iii) searching for additional
21 information and documents requested by my attorneys, (iv) reviewing and approving the written notice
22 to the Labor and Workforce Development Agency and the complaint and other papers filed with the
23 court, (v) participating in mediated settlement discussions, (vi) reviewing and executing the settlement
24 agreement, and (vii) reviewing and signing the declarations submitted to this Court in support of the
25 settlement. During the three years that this lawsuit has been pending, I have easily spent at least 1.5
26 hours per month, on average—or more than 50.0 hours total—in progressing the litigation on behalf of
27 the Class.

13 6. I have discussed the terms of the settlement agreement with my attorneys, and based on
14 my understanding of the case, I am of the opinion that settlement for the consideration and on the terms
15 set forth in the settlement agreement is fair, reasonable, and adequate, and in the best interests of the
16 Class.

21 I declare under penalty of perjury under the laws of the State of California that the foregoing is
22 true and correct. Executed this 26th day of July 2023, at Yorba Linda, California.

DECLARATION OF TARA JOY IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT