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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

EDITH RODRIGUEZ, an individual, on behalf of herself and all others similarly situated; JONATHAN URIBE, an individual, on behalf of himself and all others similarly situated; RODOLFO RODRIGUEZ, an individual, on behalf of himself and all others similarly situated; DAVID HORMAECHEA, an individual, on behalf of himself and all others similarly situated; and SEBASTIAN HORMAECHEA, an individual, on behalf of himself and all others similarly situated,

Plaintiff,

vs.

DYNAMIC AUTO IMAGES, INC., a corporation; et al.,

Defendants.

Case No. 30-2019-01092692-CU-OE-CXC

[Assigned for all Purposes to the Honorable William Claster, Dept. CX101]

CLASS ACTION

DECLARATION OF PLAINTIFF DAVID HORMAECHEA IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS AND REPRESENTATIVE ACTION SETTLEMENT

Date: October 23, 2026
Time: 9:00 a.m.
Dept: CX101

Complaint Filed: August 26, 2019
Trial Date: None Set

DECLARATION OF DAVID HORMAECHEA

I, DAVID HORMAECHEA, declare as follows:

1. I am a named plaintiff in the above-captioned action, *Edith Rodriguez, et al. v. Dynamic Auto Images, Inc., et. al.,* Orange County Superior Court Case No. 30-2019-01092692-CU-OE-CXC (the "Action"). I am submitting this declaration on the basis of personal knowledge, except as to those matters stated on information and belief. If called as a witness, I could and would readily and competently testify to the accuracy of the statements set forth below.

2. I make this declaration in support of Plaintiffs' Motion for Final Approval of Class and Representative Action Settlement.

3. I was employed by Defendants as a detailer, porter, and driver at the Kearney Penske dealership from approximately July 2020 to approximately October 2020.

4. I have spent approximately 25 hours on this case, including, but not limited to, responding to multiple sets of interrogatories and to requests for production of documents; meetings and conversations with my attorneys and their staff; reviewing and discussing with my attorneys and their staff my declaration in support of the Motion for Class Certification; searching for and producing relevant documents; responding to questions from my attorneys and their staff; staying informed about updates in the case; and reviewing settlement documents and my declarations in support of the approval motions.

5. I fully realized the risks I would be taking by pursuing this class action as a named plaintiff and class representative. I knew that my future employers might conduct a background check on me or otherwise find out about my participation in the lawsuit against a previous employer and might retaliate against me as a result. I also knew that, as a class representative, I would be bearing risks that the absent Class Members would not be facing.

6. I also knew that I placed myself at a substantial risk because if Defendants were to prevail in this action I could have been liable for Defendants' litigation costs. Yet, I felt so strongly about standing up for the rights of Defendants' employees that I initiated and participated fully in this lawsuit.

7. From the time I retained Matern Law Group, PC, I took an active role in participating in decisions concerning the case, including settlement. I maintained regular contact with my attorneys on the case to give them additional information and to keep myself informed of the developments in the case. I made sure that I understood everything that was going on in the case, so I could make the best informed decisions on behalf of the class and myself.

8. I believe that the requested $10,000 Class Representative Service Payment for serving as a class representative is reasonable given the substantial time and effort I have spent on behalf of the class and the risks I faced in serving as a named plaintiff and class representative.

9. Based on my information and belief, approximately 2,108 individuals will receive the opportunity to participate in the settlement and to recover payment for the alleged wage and hour violations. Because I put myself on the line, each Class Member does not have to expend his or her own time and resources to pursue legal action for unpaid wages individually. This action would not have been possible without my active participation and my willingness to place myself at risk for the sake of the other Class Members.

10. I am not related to anyone associated with Matern Law Group, PC. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive in this matter is whatever amount the Court awards as a service payment, as well as my share of the Net Settlement Amount as a class member.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on Sep 25, 2026 in San Diego, California.

David Hormaechea (Sep 25, 2026 13:46:21 PDT)

DAVID HORMAECHEA