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7 Attorneys for Defendant SOCAL FRAMING, INC.

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF RIVERSIDE**

10
11 STEVE DIAB QAWAS, as an individual and on
behalf of all others similarly situated,

12 Plaintiff,

13 vs.
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15 SOCAL FRAMING, INC., a California
Corporation; and DOES 1 through 100,

16 Defendant.
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Case No. RIC1902588

[Assigned for all purposes to The Honorable
Sunshine S. Sykes, Dept. 06]

DECLARATION OF KIM KESSLER

Action Filed: April 23, 2019
Trial Date: None set

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2 I, Kim Kessler, declare:

3 1. I am over the age of eighteen and work as the Office Manager for SoCal Framing,
4 Inc. In this position, I am familiar with SoCal Framing's business and employment-related records.
5 I have personal knowledge of, access to, and possession, custody, and control of business and
6 employment-related records regarding SoCal Framing and its current and former employees. It is
7 SoCal Framing's regular practice to maintain such records. In making this declaration, I reviewed
8 the business and employment-related records of SoCal Framing. If called as a witness, I could and
9 would competently testify to the following.

10 2. I understand that SoCal Framing is a defendant in a class action, the parties to which
11 are named in the above caption. I also understand that the relevant period for this action is April 23,
12 2015 through the date that the Court preliminarily approves the settlement (the "class period"). I
13 further understand that putative class is defined as all current and former employees who worked
14 for SoCal Framing in California during the class period.

15 3. The members of the putative class have an average age of approximately 30-35
16 years. The vast majority have a high school education level. Each person's experience varies, but
17 most employees received on the job training. In addition, the entire workforce is able read and
18 comprehend either or both English and Spanish.

19 I declare under penalty of perjury that the foregoing is true and accurate.

20 Executed on January 26th, 2021 in Anaheim, California.
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25 Kim Kessler
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