Arrash T. Fattahi (SBN 333676)
afattahi@wilshirelawfirm.com
Arman A. Salehi (SBN 351112)
arman.salehi@wilshirelawfirm.com
Trenten Bilodeaux (SBN 332692)
trenten.bilodeaux@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
660 South Figueroa Street, Sky Lobby
Los Angeles, California 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff Thomas Brown

[Additional counsel on following page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

THOMAS BROWN and ANTHONY DOSS, individually, on behalf of all others similarly situated, and on behalf of the State of California and other aggrieved persons,

Plaintiffs,

v.

FIDELITY SECURITY SERVICES, INC., a corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No. 21STCV31617

Assigned for All Purposes To:
Hon. Theresa M. Traber
Department: 1

SUPPLEMENTAL DECLARATION OF NORMA AYALA OF APEX CLASS ACTION, LLC CERTIFYING DISBURSEMENT OF SETTLEMENT FUNDS RE: RESIDUAL FUNDS

Harout Messrelian (SBN 272020)
hm@messrelianlaw.com
MESSRELIAN LAW INC.
500 N. Central Ave, Suite 840
Glendale, California 91203
Telephone: (818) 484-6531

Attorneys for Plaintiff Anthony Doss

I, Norma Ayala, declare as follows:

1. I am a resident of the United States of America and am over the age of 18. I am a Case Manager for Apex Class Action, LLC (hereinafter referred to as "Apex"), the professional settlement services provider appointed by the Court to serve as the Settlement Administrator for the above-captioned *Brown v. Fidelity Security Services* matter. On behalf of both Apex and myself, I possess the authority to issue this declaration. I am personally acquainted with the information contained herein, and in the event of being summoned to provide testimony, I am fully capable and willing to provide competent testimony regarding these facts.

2. Apex received the Gross Settlement Amount of $222,500.00 in six installments: $50,000.00 on February 26, 2025; $25,000.00 on April 29, 2025; and $36,875.00 on each of July 9, 2025, August 27, 2025, November 3, 2025, and February 3, 2026. Apex also received $4,650.69 for employer-side payroll taxes, paid in addition to the Gross Settlement Amount, bringing the total funding received to $227,150.69. The itemized allocation is as follows:

   a. $93,719.44 for gross payment of the Individual Settlement Payments to the 271 Settlement Class Members and $3,750.00 to the 188 Aggrieved Employees;
   b. $74,166.67 for payment of Class Counsel's attorney fees;
   c. $17,613.89 for payment of Class Counsel's costs;
   d. $12,500.00 for a Service Award to Plaintiffs Thomas Brown and Anthony Doss, with Thomas Brown receiving $7,500.00 and Anthony Doss receiving $5,000.00;
   e. $9,500.00 for payment of settlement administration costs to Apex;
   f. $11,250.00 for the payment to the California Labor and Workforce Development Agency ("LWDA Payment"); and
   g. $4,650.69 for the payment of the employer's portion of applicable payroll taxes on the "wages" portion of the Individual Settlement Payments.

3. On April 29, 2026, the payment of Class Counsel's attorney fees, in the amount of $74,166.67, was completed.

4. On April 29, 2026, the payment of Class Counsel's costs, in the amount of $17,613.89, was completed.

5. On April 29, 2026, Apex issued and mailed the Service Awards to Plaintiffs Thomas Brown and Anthony Doss, in the amount of $12,500.00.

6. On April 29, 2026, payment of the settlement administration costs to Apex, in the amount of $9,500.00, was completed.

7. On April 29, 2026, Apex issued and mailed the LWDA Payment, in the amount of $11,250.00.

8. On April 29, 2026, Apex issued and mailed the Individual Settlement Payment checks to the 271 Settlement Class Members. The total net amount sent to Settlement Class Members was $88,671.48, as $8,797.96 was withheld for all applicable employee payroll taxes. This total includes the $3,750.00 allocated to the 188 Aggrieved Employees.

9. On April 29, 2026, payment to the Internal Revenue Service, for all applicable Federal payroll taxes, in the amount of $10,145.16, was completed.

10. On April 29, 2026, payment to the Employment Development Department, for all applicable State payroll taxes in the amount of $3,303.49, was completed.

11. The deadline for the Settlement Class Members to cash their Individual Settlement Payment check was October 26, 2026, 180 days after its issuance.

12. As of the date of this declaration, a total of $39,468.12 remains uncashed following the check cashing deadline. In accordance with the settlement agreement approved by the Court, the uncashed funds will be sent to the cy pres Legal Aid at Work once the Court issues an amended order.

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 and that this Declaration was executed this 6th day of November 2026, in Irvine, California.

Norma Ayala

NORMA AYALA