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U.S. POLE COMPANY, INC.

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

JOSE CABRERA, individually, and on behalf
of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

v.

U.S. POLE COMPANY, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 20STCV36092

**DECLARATION OF GEORGE PRESTON
IN SUPPORT OF PAYMENT PLAN FOR
MOTION FOR PRELIMINARY
APPROVAL**

Complaint Filed: September 22, 2020
Trial Date: None set

DECLARATION OF GEORGE PRESTON

I, GEORGE PRESTON, declare as follows:

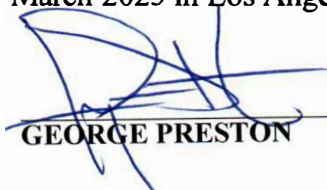
1. I am the CEO of U.S. Pole Company, Inc. (U.S. Pole) and defendant in the above captioned action. I have personal knowledge of the matters set forth herein and am competent to testify to the same called to do so.

2. I have reviewed the Settlement Agreement including Section 6.1 requiring a declaration of the defendant supporting the need for the installment plan as outlined in Section 4.3 of the Settlement providing for two (2) installment payments: (a) \$250,000.00 to be paid within thirty (30) calendar days after Final Approval ("First Installment"), and (b) \$250,000.00 to be paid out six (6) months after the First Installment ("Second Installment"). I submit this declaration in support of Plaintiff's Jose Cabrera ("Plaintiff") and U.S. Pole's unopposed Motion for Preliminary Approval of the settlement reached in this action between Plaintiff and U.S. Pole.

3. Defendant cannot fund the entire settlement in the amount of \$500,000 without the proposed installment plan without substantial financial hardship. U.S Pole's financial condition was addressed at the mediation on March 14, 2023, and following mediation including production of P&L statements and Consolidated Financial Statements and Independent Accountants' Review Report Year End June 30, 2018 – June 30, 2022 confirmation U.S Pole's downturn in business and financial hardship. Since the mediation, U.S. Pole's downward in business and financial condition has continued. As such, Defendant requires that payment be completed in two payments, each of \$250,000 with the second installment due 6 months after the first installment payment.

4. I understand that the proposed cy pres recipient, Court Appointed Special Advocates ("CASA"), was selected because of its non-profit organization or foundation. I have no involvement with or interest or relationship, financial or otherwise, with CASA outside the context of this lawsuit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 4 day of March 2025 in Los Angeles, CA.


GEORGE PRESTON