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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

DAVID STEVENS and MICHAEL ADAMS,
individuals, on behalf of themselves and on
behalf of all persons similarly situated,

Plaintiff,

v.

KAMPS PROPANE, INC., a California
Corporation; and DOES 1-50, Inclusive;

Defendants.

Case No. 37-2021-00016367-CU-OE-CTL

**DECLARATION OF MICHAEL ADAMS IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: May 21, 2027

Time: 9:00 a.m.

Judge: Hon. Michael T. Smyth

Dept.: C-67

1 I, Michael Adams, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am the lead named Plaintiff in the
4 above wage and hour class action filed against Defendant Defendants Kamps Propane, Inc. and Superior
5 Plus Energy Services Inc. ("Defendants").

6 2. This declaration is being submitted in support of Plaintiffs' motion for Preliminary
7 Approval of Class Action and PAGA Settlement.

8 3. I believe that I am, have been, and will continue to represent the interests of the class
9 fairly and adequately. I have claims that are typical of the claims the Class Members that I am seeking
10 to represent.

11 4. I was employed by Defendant from October 2021 to March 2023, as a non-exempt
12 employee. At all times during my employment, I was denied legally compliant meal and rest periods,
13 minimum wages, and overtime compensation. Throughout my employment, I was subject to
14 Defendants' written policies and procedures contained in, among other documents, the Employee
15 Handbook.

16 5. Generally, my lawsuit claims that Defendants failed to pay wages at the correct regular
17 rate of pay, failed to provide compliant meal and rest periods, failed to pay for all hours worked, failed
18 to reimburse employees for all necessary business expenses, failed to issue accurate itemized wage
19 statements, and failed to pay all wages when due, and violations of the Private Attorneys General Act
20 ("PAGA").

21 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
22 to represent because I was subject to the same alleged unlawful employment policies and practices at
23 issue in this action, including but not limited to, Defendants' failure to provide complaint meal and
24 rest periods, failure to pay overtime and sick pay at the correct regular rate of pay, failure to reimburse
25 for mandatory business expenses, failure to furnish accurate itemized wage statements, failure to pay
26 for all hours worked, and failure to pay all wages when due. Factually, Defendants' policies and
27 practices apply class wide, and Defendants' liability can be determined by facts common to all
28 members of the Class.

1 7. Further, there is no conflict between my interests and the interests of the class that I am
2 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that
3 I was injured by the same company-wide policies and practices to which the proposed Class was
4 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
5 of the Class by initiating this litigation, undertaking extensive class discovery, and evaluating the
6 proposed settlement to assure that it is fair.

7 8. I understood that at the time I filed this action, as a Class Representative, I owed a duty
8 to the putative class members to faithfully prosecute this action with their best interests at the forefront
9 of every decision. I understood that I could not make any decision in this action for the sole benefit
10 of my personal interest. I understood that in executing this duty, I might have been asked to sacrifice
11 my personal best interests for the benefit of the interests of the putative class members. Nevertheless,
12 I knowingly and voluntarily undertook this duty in order to provide the broadest possible relief for my
13 former co-workers for what I perceived to be Defendants' unlawful wage and hour practices. I believe
14 that I faithfully executed the duties of a Class Representative throughout this litigation and will
15 continue to do until this litigation is fully and finally resolved.

16 9. I believe that the proposed settlement before the Court is fair, reasonable, and adequate,
17 and made in the best interest of the Settlement Class Members. Consequently, I respectfully, and
18 humbly, ask the Court to grant preliminary approval of the Settlement and all of its terms.

19 I declare under the penalty of perjury under the laws of the State of California that the foregoing
20 is true and correct. Executed 08/10/2026, at Sacramento, (City/Location)
21 California.

22 By: s (Aug 10, 2026 21:23:28 PDT)
23 MICHAEL ADAMS
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