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11 Attorneys for ABEL ESCOBEDO and CHRISTOPHER
CARVER, on behalf of themselves, all others similarly
12 situated, and on behalf of the general public

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO, NORTHERN DIVISION**

14 ABEL ESCOBEDO and CHRISTOPHER
15 CARVER on behalf of themselves, all
others similarly situated, and on behalf of
16 the general public ,

17 Plaintiffs,

18 v.

19 Matheson Tri-Gas, Inc. an unknown
business entity; Noelle Renouf, an
20 individual; Marvin Solis, an individual
and DOES 1 through 25, inclusive,

21 Defendants
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Case No. 37-2020-00044507-CU-OE-CTL

**DECLARATION OF ZACHARY T.
TYSON**

1 I, ZACHARY T. TYSON, declare as follows:

2 1. I am an attorney at law duly licensed to practice before all Courts of the State of
3 California. I am one of the attorneys of record in this matter. I am familiar with the facts
4 and legal proceedings in this case and have personal first-hand knowledge of the facts
5 herein. If called as a witness, I could and would competently testify to the facts stated
6 herein.

7 2. I have practiced law in San Diego County for approximately 19 years.

8 3. My billable rate is \$650.00 dollars per hour.

9 4. My law firm practice is focused on employment litigation. I have extensive
10 experience litigating employment representative class action and PAGA claims. I have
11 tried approximately 15 matters to verdict by jury, bench trial or arbitration award.

12 5. I reasonably estimate that I spent North of 90 hours on this case.

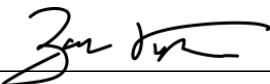
13 6. I interviewed our plaintiff, ABEL ESCOBEDO, at the outset of the litigation. I
14 attended pre-litigation meetings and worked closely with Mr. Botham in preparing the
15 initial draft of the lawsuit. I prepared for and attended the mediation in this matter.

16 7. I believe the proposed settlement is fair and reasonable.

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct and that this declaration was executed in San Diego,
19 California.

20 Dated: September 25, 2023

21 By:


22 Zachary T. Tyson
23 Attorney for ABLE ESCOBEDO
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