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Attorneys for Plaintiffs Amanda Olvera and Sabrina Mendiola

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF STANISLAUS

BRANDON HAWKINS and BRIAN
CANADY, individually and on behalf of all
others similarly situated,

Plaintiff,

vs.

ONTEL SECURITY SERVICES, INC., a
California corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. CV-20-005404

Consolidated with Case No. CV-21-002299

**DECLARATION OF PLAINTIFF
SABRINA MENDIOLA IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: April 11, 2025
Time: 8:30 a.m.
Dept.: 23

AMANDA OLVERA and SABRINA
MENDIOLA 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;

Plaintiffs,

vs.

ONTEL SECURITY SERVICES, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

1 I, Sabrina Mendiola, hereby declare and state as follows:

2 1. I am an individual over the age of 18 years old. I am one of the named plaintiffs in this
3 matter. I have personal knowledge of the facts set forth below, and if called to testify I could and would
4 do so competently.

5 2. In or around March 2020, I was hired by Defendant Ontel Security Services, Inc.
6 (“Defendant”) to work as a non-exempt loss prevention employee. In or around May 2020, my
7 employment with Defendant ended. Throughout my employment, I was denied 30-minute off-duty meal
8 periods for shifts longer than 5 hours. I also did not receive 10-minute off-duty rest periods for every
9 3.5 hours I worked for Defendant. I also was not paid wages for all applicable minimum and overtime
10 wages for all hours worked, including for time spent maintaining my uniform. I also was not
11 reimbursed business expenses, including for cell phone expenses.

12 3. During the pendency of this lawsuit, I provided assistance to my attorneys, including
13 speaking with them and providing them with documents and information. I estimate that I spent
14 approximately 37 hours meeting and/or conferring with my attorneys in connection with the assistance
15 of the class claims, such as providing information and various documents and reviewing the
16 memorandum of understanding, the settlement agreement, my declaration, and the various pleadings in
17 this case. I have continuously been kept apprised of the status of this case.

18 4. I understand that the class claims alleged in this action were brought on behalf of other
19 similarly situated employees, and thus I am acting as a representative and a fiduciary for the Class. As a
20 class representative, I understand that it is my responsibility to act in the best interest of the Class and
21 not my own. I agree that I will not put my own interests ahead of that of the Class. Moreover, I am not
22 aware of any conflicts that exist between my interest and the interests of the Class that would impair or
23 affect my ability to serve as representative for the Class.

24 5. I have assisted, and continue to be willing to assist, in the investigation of this matter and
25 to make myself available for trial or any further proceeding in this matter as required to represent the
26 interests of the Class. I also understand my duties and responsibilities to the proposed class and will
27 carry out those duties as necessary.

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6. Based on my understanding of the case, I believe that the settlement for the consideration and on the terms set forth in the Settlement Agreement is fair, reasonable, and adequate and is in the best interests of the Class.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 30, 2024, at Oakdale, California.

Electronically Signed 2024-09-30 17:18:07 UTC - 76.228.28.12



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SABRINA MENDIOLA