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

BENJAMIN BROWN-BAXTER, as an
individual and on behalf of aggrieved
employees,

Plaintiff,

vs.

TUTOR PERINI CORPORATION, a
Massachusetts corporation; DESERT
MECHANICAL, INC., a Nevada
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 21STCV30039

(Assigned to the Honorable Colin P. Leis, Dept.
74)

**DECLARATION OF BENJAMIN BAXTER-
BROWN IN SUPPORT OF PLAINTIFF'S
MOTION TO APPROVE THE PARTIES'
SETTLEMENT AGREEMENT PURSUANT
TO THE LABOR CODE PRIVATE
ATTORNEYS GENERAL ACT OF 2004**

Reservation No.: 326040727832

Date: August 23, 2023

Time: 8:30 A.M.

Dept.: 74

Action Filed: August 13, 2021

Trial Date: April 22, 2024

DECLARATION OF BENJAMIN BAXTER-BROWN

I, Benjamin Baxter-Brown, declare as follows:

1. I am an individual over the age of 18. I am the named Plaintiff in the above-referenced action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. This declaration is submitted in support of Plaintiff's Motion to Approve the Parties' Settlement Agreement Pursuant to the Labor Code Private Attorneys General Act of 2004.

3. I was employed by Defendants Desert Mechanical, Inc. and Tutor Perini Corporation (together, "Defendants") as a Plumber Apprentice from about February 2020, until about December 15, 2020.

4. During my employment with Defendants, I received paychecks that were drawn from M&T Bank. There was no address listed for M&T Bank on my paychecks, and I believe M&T Bank did not have a location in California where I could cash my paycheck without a fee.

5. I understood that this action was also being prosecuted on behalf of the State of California as a private attorney general. During the pendency of this lawsuit, I was required to provide assistance to my attorneys, including speaking with them and providing them with documents and information and reviewing filings and the notice to the Labor and Workforce Development Agency. I estimate that I spent at least 20-25 hours meeting and/or conferring with my attorneys in assisting to prosecute the claims in this lawsuit, which included discussing the proposed settlement, Defendants' policies and procedures, and the relationship between the Defendants, among other things. Throughout this case, I have been kept apprised of the status of this case.

6. I believe that the settlement is fair, adequate, and reasonable for employees and the State of California. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive accomplishment and understand that other people and the State of California will benefit because of the actions that I have taken.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on this
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28 day of July 2023, at Hanford, California.

DocuSigned by:

Benjamin Baxter-Brown