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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

PATRICIA BURROLA, NATHAN
RODRIGUEZ, KIRSTIE ROSSMAN,
individually, and on behalf of other members
of the general public similarly situated;

Plaintiffs,

vs.

OX CAR CARE, INC., a Delaware
corporation; and DOES 1 through 100,
inclusive,

Defendants.

PATRICIA BURROLA, individual, and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act,

Plaintiff,

vs.

OX CAR CARE, INC., a Delaware
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 30-2021-01216803-CU-OE-CXC
[Consolidated with Case No.
20-2021-01228564-CU-OE-CXC]

Honorable Layne H. Melzer
Department CX102

CLASS ACTION

**DECLARATION OF PATRICIA
BURROLA IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT AGREEMENT AND
RELEASE OF CLAIMS**

Reservation ID: 74938063
Hearing Date: November 5, 2026
Hearing Time: 2:00 p.m.
Department: CX102

Complaint Filed: August 16, 2021
FAC Filed: May 4, 2022

Trial Date: None Set

DECLARATION OF PATRICIA BURROLA

I, Patricia Burrola, hereby declare as follows:

1. I am over 18 years of age and a former resident of California currently residing in Virginia. I am the named plaintiff in the above-captioned cases. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Ox Car Care, Inc. ("Defendant") from approximately January 2020 to approximately March 2020 as an hourly-paid or non-exempt employee working as a Protection Specialist/Screenener. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for not properly compensating employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative. Prior to commencing the cases, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the cases, I have spent time speaking with my attorneys regarding the cases and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid or non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. Throughout these matters, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to

1 them as quickly as possible and gave them as much information and identified as many documents
2 as I could. I spent time speaking with my attorneys about the cases, identifying potential witnesses,
3 providing my attorneys with documents and information concerning the cases, and also describing
4 policies, practices, and procedures of Defendant.

5 5. As far as the settlement is concerned, I was available to review documents and
6 answer any questions my attorneys had. I reviewed the Settlement Agreement and discussed the
7 questions I had regarding the potential settlement with my attorneys before signing the settlement
8 papers.

9 6. I understand that a settlement has been reached in my cases and what my duties and
10 responsibilities are as a class and PAGA representative. For example, I am aware that if the
11 settlement is granted preliminary approval, the Court will certify a class for settlement purposes,
12 and likely appoint me as the representative of the class and my attorneys as counsel for the class. I
13 also understand that my duties will include checking in on, monitoring, and conferring with my
14 attorneys to facilitate the notice and settlement administration process, and to provide information
15 that the Court needs in order to assess whether the settlement is fair, reasonable, and adequate.
16 Further, if any individuals who are potential class members contact me, I will take steps to have
17 them referred to the Court-appointed settlement administrator so that these individuals may receive
18 the necessary information and notice they may be eligible to receive in connection with the
19 settlement and contemplated final approval hearing.

20 7. I believe that I have done everything that my attorneys have asked of me and have
21 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class
22 members and the State of California with respect to aggrieved employees. I have volunteered to
23 represent and champion the interests of many other people with similar claims and injuries because
24 of the importance of the case and the necessity that all class members and aggrieved employees
25 benefit from the lawsuits equally. I understand that as a proposed class representative, and if
26 formally appointed as a class representative, I have and continue to represent the interests of all
27 members of the class in litigation to recover relief for the class. As an hourly-paid or non-exempt
28 employee of Defendant who was subject to the same policies, practices, and procedures as the

1 other members of the class, I have claims that are typical of those of the class. I consider the
2 interests of the class just as I would consider my own interests. I understand that I may need to put
3 the interests of the class before my own interests, although I have no reason to believe that my
4 interests are in conflict with the interests of the class. I understand that any resolution of the
5 lawsuit is subject to court approval and must be in the best interest of the class as a whole. I have
6 participated, and continue to participate, in the lawsuit as necessary. I have actively followed and
7 monitored the progress of the lawsuit, and have taken steps to make sure that the litigation is
8 prosecuted by the skilled and effective attorneys that I have retained.

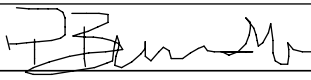
9 8. I think my efforts helped to get the result obtained in these consolidated matters,
10 and as a potential class and PAGA representative, I respectfully request that the Court award me an
11 enhancement award for my efforts in pursuing and participating in these consolidated matters.
12 Taking into consideration the time that I have dedicated to these matters, I believe that this amount
13 is reasonable.

14 9. I am not related to anyone associated with Lawyers for Justice, PC. In addition, I
15 have no relationship or affiliation with the proposed *cy pres* recipient Legal Aid at Work.

16 10. I have not entered into any undisclosed agreements, nor have I received any
17 undisclosed compensation in the consolidated actions. The only compensation I will receive is
18 whatever amount the Court awards as an enhancement award, as well as my share of the settlement
19 as a class member and aggrieved employee.

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

22 Executed on this ^{07/23/2026} day of July 2026, at Suffolk, Virginia.

23 Electronically Signed  2026-07-23 16:46:21 UTC - 204.111.239.71
Nintex AssureSign® 3db6ff74-2da0-42f3-8ae4-048e0175b609

24 Patricia Burrola