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Fidelity Security Services, Inc.
7

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**
10

11 THOMAS BROWN and ANTHONY DOSS,
individually, on behalf of all others similarly
12 situated, and on behalf of the State of California and
other aggrieved persons,

13 Plaintiffs,

14 vs.

15 FIDELITY SECURITY SERVICES, INC., a
16 California corporation; and DOES 1 through 10,
inclusive,

17 Defendants.
18

Case No. 21STCV31617

*[Assigned for all purposes to
Hon. Stuart M. Rice, Dept. 1]*

**DECLARATION OF HOWARD M.
KNEE IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL**

Complaint Filed: 11/24/2021

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1. I am an attorney licensed to practice in the State of California and a partner at the law firm of Blank Rome LLP. I am counsel of record for Defendant Fidelity Security Services, Inc. in the above referenced action. I make this declaration in support of the Motion for Preliminary Approval (the “Motion”) filed on or about June 27, 2024 in this matter (the “Action”). I have personal knowledge of the facts set forth in this declaration, and if called upon to testify as a witness, I could and would competently testify to the following facts.

3. I am also not aware of any conflicts of interest or any other reason that would prevent Legal Aid at Work from serving as the Cy Pres Recipient or that would prevent Apex Class Action Administration from serving as the Class Administrator.

Executed this 27th day of June 2024, at Los Angeles, California.

160699.00205/135976768v.2

Brown, et al. v. Fidelity Security Services, Inc., et al.
21STCV31617

I, Ashley Narinyans, am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to this action. My business address is 3055 Wilshire Blvd., 12th Fl., Los Angeles, California 90010. My electronic service address is ashley.narinyans@wilshirelawfirm.com.

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(X) **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed above via third-party cloud service **CASEANYWHERE**.

Harout Messrelian (SBN 272020)
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Attorneys for Plaintiff Anthony Doss

(X) **BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known e-mail address or e-mail of record in this action.

(X) **BY UPLOAD:** I hereby certify that the documents were uploaded by my office to the State of California Labor and Workforce Development Agency Online Filing Site.

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

3 Executed this **June 28, 2024**, at Los Angeles, California.

4 
5 _____
6 Ashley Narinyans
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