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

DARREL NORTHRUP, individually, on a
representative basis, and on behalf of all
others similarly situated,

Plaintiff,

v.

GUYOU CONSTRUCTION, INC., a
California Corporation; MARCUS A.
GUYOU, an individual; and DOES 1
through 20, inclusive,

Defendants.

Case No. CVRI 2105858

**DECLARATION OF MARCUS GAYOU
REGARDING CLASS MEMBERS**

Hearing

Date: August 7, 2023
Time: 8:30 a.m.
Dept. 1

Complaint filed: December 29, 2021

I, Marcus Gayou, state and declare:

1. I am a Defendant in the above action and the Chief Executive Officer and Founder of Guyou Construction, Inc.
2. I submit this Declaration in support of the Motion for Preliminary Approval of Class Action Settlement.
3. The likely age of the class members is between 25 and 40 years old.
4. The education of the class members is from high school graduates to those who have

1 attended trade school and/or have some college education.

2 5. The experience of the class members is typically 2 to 5 years in related work/industry.

3 6. All of the class members should be able to read and comprehend English.

4 I declare under penalty of perjury under the laws of the State of California that the foregoing
5 is true and correct. Executed on 12th of July, 2023, at Riverside, California.

6 By. 
7 Marcus Gayou