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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

VICTOR DE LA CRUZ, individually, and on
behalf of other members of the general public
similarly situated,

Plaintiff,

vs.

NORTHWEST PIPE COMPANY, an Oregon
corporation; and DOES 1 through 25, inclusive,

Defendants.

Case No.: CIVSB2211140

Honorable Joseph T. Ortiz
Department S17

PROOF OF SERVICE

Complaint Filed: May 25, 2022
FAC Filed: February 2, 2023
Trial Date: Not Set

1 **PROOF OF SERVICE**

2 I, Stephany Sinaguinan, certify and declare as follows:

3 I am over eighteen years of age and not a party to the within action; my business address is
4 8383 Wilshire Blvd, Suite 745, Beverly Hills, California 90211. On March 15, 2024, I served a copy
5 of the following documents:

- 6 • **NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF**
7 **CLASS ACTION AND PAGA SETTLEMENT; MEMORANDUM OF POINTS**
8 **AND AUTHORITIES IN SUPPORT THEREOF**
9 • **DECLARATION OF JONATHAN M. GENISH IN SUPPORT OF**
10 **PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS**
11 **ACTION AND PAGA SETTLEMENT**
12 • **DECLARATION OF PLAINTIFF VICTOR DE LA CRUZ IN SUPPORT OF**
13 **MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND**
14 **PAGA SETTLEMENT**
15 • **[PROPOSED] ORDER GRANTING PRELIMINARY APPROVAL OF CLASS**
16 **ACTION AND PAGA SETTLEMENT**

17 on the interested parties as follows:

18 Robert Sarkisian
19 Bryan L. Hawkins
20 **STOEL RIVES LLP**
21 500 Capitol Mall, Suite 1600
22 Sacramento, CA 95814
23 E-mails: robert.sarkisian@stoel.com
24 bryan.hawkins@stoel.com
25 sharon.witkin@stoel.com
26 linda.vallin@stoel.com

27 *Attorneys for Defendant Northwest Pipe Company*

28 ☒ **BY ELECTRONIC MAIL (E-MAIL):** I caused said documents to be delivered electronically
to be delivered to the above referenced addressees via email from email address
ssina@blackstonepc.com pursuant to California Code of Civil Procedure section 1010.6(e)(1).
I did not receive any electronic message or other indication that the transmission was
unsuccessful.

State of California, Labor & Workforce Development Agency
Web URL:
<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

☒ **BY ONLINE SUBMISSION:** The foregoing documents were transmitted to the California
Labor and Workforce Development Agency through the online system established for the
submission of notices and documents, in conformity with California Labor Code section
2699(l). I did not receive any electronic message or other indication that the transmission was
unsuccessful.

1 ☒ **STATE** – I declare under penalty of perjury under the laws of the State of California that the
2 above is true and correct.

3 Executed on March 15, 2024, at Beverly Hills, California.

4 

5 _____
6 Stephany Sinaguinan