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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN JOAQUIN

Rodrigo Lopez Rojas and Enrique Guzman
Orozco, individually, and on behalf of other
members of the general public similarly situated,
and on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiff,

vs.

Hale Construction, Inc. a California
corporation; and DOES 1-10, inclusive,

Defendants.

CASE NO. STK-CV-UOE-2022-0003667
Assigned to Honorable Robert T. Waters
Department: 11B

**DECLARATION OF JOHN HALE RE:
CLASS ACTION SETTLEMENT**

I, John Hale, hereby declare as follows:

1. I am the Vice President for Defendant Hale Construction, Inc.
("Defendant"). The following facts are true of my own personal knowledge and, if called
upon to testify to the truth of these statements, I could and would competently do so under
oath.

2. On May 11, 2022, plaintiff Rodrigo Lopez Rogas ("Rojas") filed a putative class
action against Defendant, Case No. STK-CV-UOE-2022-0003667. On June 28, 2023,

1 plaintiff Enrique Guzman Orozco ("Orozco") filed a putative class action against
2 Defendant, Case No. STK-CV-UOE-2023-8042.

3 3. I am not aware of any other overlapping class action, collective action, or PAGA
4 representative action against Defendant.

5 4. Defendant has no conflicts of interest with the class administrator, Phoenix
6 Settlement Administrators.

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

9 Executed on this 20th day of July, 2026 in San Joaquin County.

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12 JOHN HALE