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Attorneys for Defendant,
NORTH AMERICAN VIDEO CORPORATION

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

BRENDAN SMITH and INSIYAH HAAMID
on behalf of themselves, all others similarly
situated, and on behalf of the general public,

Plaintiffs,

vs.

NORTH AMERICAN VIDEO
CORPORATION; and DOES 1-100,

Defendants.

Case No. 30-2022-01277227-CU-OE-CVC
(Consolidated with Case No. 30-2022-01277262-CU-
OE-CVC)

[Assigned for all purposed to the Hon. Layne H.
Melzer of Dept. CX-102]

**DECLARATION OF BETH SKAKUN IN
SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND PAGA
SETTLEMENT**

Complaint Filed: August 24, 2022
FAC Filed: November 24, 2025
Trial Date: None Set

DECLARATION OF BETH SKAKUN

I, Beth Skakun, hereby declare as follows:

1. I am the Vice President of Human Resources for Defendant North American Video Corporation ("NAVCO"). I have personal knowledge of the facts set forth in this declaration, unless stated otherwise, and if properly called to testify as a witness, I could and would competently testify thereto.

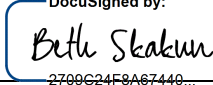
2. Based on my review of the file and relevant data in the possession of NAVCO, the highest number of work orders performed for NAVCO any one class member in this action is 4,623.

3. NAVCO is not currently aware of any class, representative, or other collective action in any other court that asserts claims similar to those asserted in this case.

4. Neither NAVCO nor its counsel have any conflict of interest with the proposed third party administrator, Simpluris, Inc.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on 6/23/2026 at Garden Grove, California.

DocuSigned by:

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 Beth Skakun