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Attorneys for Plaintiff JAMES GREGORY CONQUEST

SUPERIOR COURT OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO

JAMES GREGORY CONQUEST and ILANA
RAMOS individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

TRIPLE CANOPY, INC.; CONSTELLIS
INTEGRATED RISK MANAGEMENT
SERVICES, INC.; TRIPLE CANOPY – A
CONSTELLIS COMPANY; and DOES 1-50,
inclusive,

Defendants.

CASE NO.: 34-2022-00322538
Hon. Lauri A. Damrell

**DECLARATION OF JAMES GREGORY
CONQUEST IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA SETTLEMENT**

Date: February 2, 2024
Time: 9:00 a.m.
Dept: 28

1 I, JAMES GREGORY CONQUEST, declare:

2 1. I am a competent adult, I have personal knowledge of the facts set forth in this
3 declaration, and I am making this declaration on behalf of myself, as a named plaintiff, and in support
4 of Plaintiffs' Motion for Final Approval of Class Action and PAGA Settlement.

5 2. I was employed by Defendants Triple Canopy, Inc., Constellis Integrated Risk
6 Management Services Inc., and Triple Canopy – A Constellis Company ("Defendants") in
7 approximately November 2019 as a Non-Exempt Employee working as a Protective Security Officer
8 ("PSO") and worked during the liability period for Defendants until my separation from Defendants'
9 employ in approximately August 2021. My duties included but were not limited to providing armed
10 security guard services at the IRS offices in Fresno, California, under Federal Protective Services.
11 Plaintiff handled entry control duties, including ID check, responding to alarm activations like disputes
12 or trespassers.

13 3. I have actively participated in the litigation of this case for the benefit of all Class
14 Members. Throughout the litigation of this action, I performed the following tasks on behalf of the
15 benefit of the Class Members, including:

16 • Compilation of many documents for my attorneys;
17 • Review of many documents with my attorneys;
18 • Conducting preparation with my attorneys and participating in responding to information for
19 mediation and to informal discovery requests;
20 • Several telephone conferences with my attorneys and their representatives;
21 • Participation in the mediation; and
22 • Participation in the preliminary approval and final approval process with class
23 counsel and reviewing and signing related documents.

24 4. I estimate that I have spent approximately 55 hours thus far helping to prosecute this
25 matter.

26 5. My attorneys explained to me the risks and benefits of bringing a class action and a
27 claim under the Private Attorneys General Act ("PAGA"). I understood that pursuing the case as a
28 class and PAGA action meant that it would take substantially longer than pursuing my claims

1 individually, whether in Court or with the California Labor Commissioner, and that I risked getting
2 nothing in the end, but I believed it was important to make sure that Defendant followed the law for
3 everyone. I understood that I took on the risk, both professionally and financially, in pursuing the case
4 as a class and PAGA action rather than pursuing my claims individually. As a Class Representative, I
5 also took on the risk of having to pay Defendant's costs if we were unsuccessful in bringing our claims.

6 6. I participated in the negotiations and settlement discussions in this case, including
7 participating in mediation by phone, speaking with my attorneys to answer questions, provide any
8 additional information needed to assist the negotiations, and discussing the potential terms of the
9 Agreement to evaluate its adequacy. Throughout the course of this litigation I have asked questions
10 when I needed clarification about various aspects of this case to make sure there were continually steps
11 taken to advance the interests of Class Members.

12 7. I have not received any benefits as a result of filing this lawsuit. I have, however,
13 experienced substantial burdens as a result of filing the lawsuit that other Class Members were not
14 subject to. For example, in bringing the lawsuit, I assumed the risk of having to pay Defendant's costs
15 if the Court or jury rules against us on the claims. My understanding is that this is a substantial risk
16 because the costs associated with litigation, in general, are very high and this cost is multiplied many
17 times over in complex litigation like class actions. I have spent a substantial amount of time in this
18 case, securing a monetary benefit for many individuals who have not had to do anything whatsoever to
19 have the opportunity to receive it.

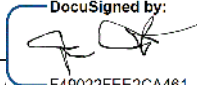
20 8. I have reviewed the final Joint Stipulation of Class Action and PAGA Settlement and
21 Release, discussed the terms with my attorney, and asked my attorney any questions I had. I believe
22 the terms of the Settlement and allocations are fair and reasonable given the facts of the case.

23 9. From the beginning of this case, I have freely chosen to accept the risks of being one of
24 the Class Representatives in this class action lawsuit. I chose to assume these risks and pursue the
25 claims on behalf of the Class Members as I wanted to vindicate their rights. I believe we have achieved
26 that result with the settlement and the individual payments to the Class Members. I believe the
27 settlement is fair reasonable and adequate based on the numerous defenses asserted by Defendants. I
28 believe the efforts and work I put forth helped to achieve the fair settlement that will benefit the Class

1 Members. As a result of my efforts, I also believe the Class Representative Enhancement Payment is
2 reasonable, and I respectfully request the Court approve the amount of \$10,000.00 to each named
3 Plaintiff as fair and reasonable.

4 10. I understand that any Class Representative Enhancement Payment I may receive is for
5 my participation as a Class Representative and it is not contingent on my support or approval of the
6 Agreement.

7 I declare under penalty of perjury under the laws of the State of California that the foregoing is
8 true and correct. Executed this 5th of January 2024 in Clovis, California.

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11  DocuSigned by:
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13 JAMES GREGORY CONQUEST
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