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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

JEFFREY MACIAS, an individual, JOVESA NAQARASE, an individual. on behalf of themselves and all others similarly situated, the general public,

Plaintiffs,

vs.

HALLMARK AVIATION SERVICES, L.P., a California Limited Partnership, and DOES 1 through 10, inclusive,

Defendants.

CASE NO.: 25STCV12975

DECLARATION OF PLAINTIFF JOVESA NAQARASE IN SUPPORT OF PLAINTIFFS' MOTION FOR APPROVAL OF PAGA SETTLEMENT

Date: November 20, 2026
Time: 1:30 p.m.
Dept.: 10
Judge: Hon. William F. Highberger

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I, Jovesa Naqarase, declare as follows:

1. I am the named representative in this case. I submit this declaration in support of Plaintiff's Unopposed Motion for Approval of PAGA Settlement. I make this statement of my own personal knowledge, and if called to testify, I could and would testify competently to the facts below.

2. I was employed by Defendant Hallmark Aviation Services, L.P. ("HAS"), as an hourly paid non-exempt employee in the position of Customer Service starting in approximately May of 2022.

3. During my time working for HAS, I believe I was not paid all wages, including all minimum and overtime wages owed to me and that I was denied uninterrupted meal and rest breaks. I was also not reimbursed for having to use my personal cell phone for the benefit of HAS.

4. During the time that I was employed at HAS, I followed the same timekeeping, scheduling and payroll policies and practices as the other hourly employees I observed and interacted with.

5. At the beginning of this case, my attorneys made me aware of the general obligations of serving as a representative Plaintiff in this case. Because of the wage and hour violations that I believe I experienced during my employment with HAS, I agreed to serve as a representative Plaintiff and pursue my case as a representative action on behalf of the State of California and similarly situated employees of HAS.

6. By deciding to serve as a Named Plaintiff in this case, I agreed to pursue not only my own PAGA claims, but the claims of all similarly situated employees of HAS, and, if necessary, to put the interest of all similarly situated employees ahead of my own. I have no interests that are antagonistic to my coworkers with respect to the claims alleged in this case. I pledged to actively participate in the lawsuit and to assume the risks of serving as a Named Plaintiff in a representative action. My attorney also explained the risks associated with litigation, and that the case could take years to resolve, and therefore required a long-term commitment on my part. I also understood that I was potentially responsible for paying HAS' attorney's fees and costs.

7. During this litigation, I have spent a significant amount of time working with my attorneys and participating in this lawsuit as follows:

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a. I regularly conferenced with my attorneys, before and after the filing of the lawsuit, to discuss the status of the case, to offer my input on HAS' practices and policies, to provide names of witnesses, to assist in gathering evidence and documents that supported the claims, and to discuss settlement options; and

b. I also spent significant time helping my attorneys prepare for mediation and answering questions about how HAS' policies and practices impacted me and my coworkers. I made myself available during the entirety of the all-day mediation which took place on zoom, approved the tentative settlement, and reviewed and approved the final settlement agreement. I regularly spoke with my attorneys to make sure I was fully informed of the facts and settlement negotiations.

8. Overall, I estimate that I have devoted 35-40 hours of my time to this case.

9. By agreeing to bring this representative action, I accepted the responsibilities of representing the interests of the State of California as well as all similarly situated employees and willingly chose to assume risks and potential costs associated with the case. I did, and still do, have a fear that future employers may not hire me should they find out that I served as a representative Plaintiff in a wage and hour lawsuit. However, this is another risk I am willing to take in order to further the interests of the case.

10. I am aware that HAS denies the allegations in this lawsuit and that there has been no determination that HAS is actually liable for any of these alleged violations. I also understand that there are many risks and uncertainties involved in continuing to pursue this case. I have been advised of the terms of the proposed settlement of this case, and in light of the risks and uncertainties in proceeding with the case, I believe the proposed settlement is fair and reasonable and in the best interests of the aggrieved employees.

I declare under penalty of perjury that the foregoing is true and correct under the laws of the State of California. Executed on 10 / 23 / 2026, in California.

JOVESA NAQARASE

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