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Attorneys for Plaintiff and the aggrieved employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

JEREMY LEGARDE, an individual, on behalf
of the State of California, as a private attorney
general,

PLAINTIFF,

v.

SPECTRA360, INC. DBA RASO
SOLUTIONS; and DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. 22CV402965

[Case Assigned for All Purposes to Hon.
Judge Patricia M. Lucas in Dept. 19]

**SUPPLEMENTAL DECLARATION OF
JEREMY LEGARDE IN SUPPORT OF
MOTION FOR REPRESENTATIVE
ACTION SETTLEMENT**

Date: 1:30 P.M.
Time: June 26, 2024
Dept: 19

Complaint Filed: September 12, 2023
Trial Date: None Set

SUPPLEMENTAL DECLARATION OF JEREMY LEGARDE

I, JEREMY LEGARDE, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant SPECTRA360, INC. DBA RASO SOLUTIONS ("Defendant" or "Spectra").

3. I brought this lawsuit, on behalf of myself and all other Aggrieved Employees, against Defendant because I believe that Defendant failed to provide lawful rest periods, failed to reimburse business-related expenses, failed to issue accurate itemized wage statements and failed to pay wages owed at time of separation to me and other employees.

4. I understand that I am representing other employees and I believe that I am able to represent them well.

5. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the settlement as needed. Additional work in connection with this matter includes providing information to my attorneys regarding my employment with Defendant, staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my attorneys' various communications regarding this matter, making myself available by phone for a full-day mediation in September 18, 2023; and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of the Aggrieved Employees.

6. I estimate the total time spent in connection with this matter is approximately 25-35 hours.

7. I have worked to actively represent the other Aggrieved Employees and their interests.

8. I have always kept the Aggrieved Employees' interests at heart in this litigation.

9. I am prepared to continue assisting with this litigation and am committed to achieving the best possible results for the Aggrieved Employees.

1 I believe that the representative action settlement obtained on behalf of the Aggrieved Employees
2 is fair and reasonable in light of the issues involved in this case.

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

6 Executed this 14th day of May, 2024 at San Diego, California.

7 DocuSigned by:
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9 _____
10 JEREMY LEGARDE
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(PROOF OF SERVICE)**[CCP 1013(a)(3)]****STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On May 23, 2024, I served all interested parties in this action the following documents described as: **SUPPLEMENTAL DECLARATION OF JEREMY LEGARDE IN SUPPORT OF MOTION FOR REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

DILLINGHAM & MURPHY, LLP

William F. Murphy

wfm@dillinghammurphy.com

Jenny J. Liao

jjl@dillinghammurphy.com

155 Sansome Street, Suite 700

San Francisco, CA 94104

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.govfa.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION): I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 23, 2024, at Chino, California.



Leslie Sanchez