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6 Attorneys for Plaintiffs
Efren Carlos Sanchez, May Quach, Jesse Coria, and the Proposed Class
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF RIVERSIDE**

10 EFREN CARLOS SANCHEZ, individually
and on behalf of others similarly situated;
11 MAY QUACH, individually and on behalf
of others similarly situated, and on behalf of
12 other aggrieved employees pursuant to the
Private Attorneys General Act; and JESSE
13 CORIA, individually and on behalf of others
similarly situated and as an aggrieved
14 employee and Private Attorney General;
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16 Plaintiffs,
17 vs.

18 ENVIRONMENTAL ASSESSMENT
SERVICES & EDUCATION OF
19 CALIFORNIA, a California corporation;
TODD ALLRED, an individual; JENNIFER
20 ALLRED, an individual; SOUTHERN
CALIFORNIA EDISON COMPANY, a
21 California Corporation; SOUTHERN
CALIFORNIA GAS COMPANY, a
22 California Corporation; and DOES 1
through 50, inclusive,
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24 Defendants.
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Case No.: CVRI2201822

**DECLARATION OF PLAINTIFF MAY
QUACH IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Hearing Information:

Date: April 23, 2026
Time: 8:30 a.m.
Dept.: 1
Judge: Hon. Harold Hopp

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1. I am over the age of 18 years old and a resident of the State of California. I have personal knowledge of the matters set forth herein, and if called upon to testify, I could and would do so competently. I make this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement.

3. I was employed by Environmental Assessment Services & Education of California (“EASE”), from approximately May 1, 2012 to approximately October 11, 2022 in the position of Home Energy Specialist. My job duties consisted of conducting outreach to prospective ‘program’ participants as directed by Defendants EASE, Southern California Edison Company (“SCEC”) and Southern California Gas Company (“SCGC”), to qualify homeowners for the different, no-cost, energy saving programs provided for by SCEC and SCGC.

5. I believe that I had a similar experience with Defendants compared to the other Class Members because we were all subjected to the same policies and practices. In particular, during my employment, Defendant EASE had a policy and practice of not providing mileage reimbursement for the miles driven by its Home Energy Specialists and Community Outreach employees when we drove from one customer to the next, even though we were utilizing our own personal vehicles for work-related purposes.

6. I have remained intricately involved in this lawsuit and have understood my responsibilities with respect to the class. I understand that as a Class Representative I have an important duty to look out for the best interests of the Class. I understood from the start of considering this case based

1 on my discussions with my lawyers that I would have to take on significant responsibilities and burdens
2 for the benefit of the Class, which could include having my deposition taken to give testimony under oath,
3 that I could face the possibility of subpoenas being issued to former and current employers, and that I may
4 testify in Court for the benefit of not only myself but the other members of the Class. I have had numerous
5 conversations with my attorneys regarding this case in order to provide them with the information and
6 documents that they needed to handle the matter. I answered numerous questions that my attorneys had
7 about the case, reviewed the complaint when it was filed, participated in discussions about mediation and
8 resolution of the matter, and reviewed the settlement agreement.

9 7. I have taken my responsibility as a Class Representative seriously and will continue to do
10 so. I have learned about the laws relating to the issues in this Action, including laws about minimum wages,
11 overtime, meal breaks and rest breaks.

12 8. I know of no conflicts between my interests and goals and the interests and goals of
13 anyone else in the Class.

14 I declare under penalty of perjury under the laws of the United States and the State of
15 California that the foregoing is true and correct. Executed on March 31, 2026, in Riverside County,
16 California.

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MAY QUACH