

John G. Yslas (SBN 187324)
John.yslas@wilshirelawfirm.com
 Eugene Zinovyev (SBN 267245)
Eugene.zinovyev@wilshirelawfirm.com
 Emily Borman (SBN 303180)
Emily.Brown@wilshirelawfirm.com
 John Brown (SBN 233605)
John.brown@wilshirelawfirm.com
 Gabriella Solé (SBN 346164)
Gabriella.sole@wilshirelawfirm.com
WILSHIRE LAW FIRM
 660 S. Figueroa Street, Sky Lobby
 Los Angeles, CA 90017
 Telephone: (213) 381-9988
 Facsimile: (213) 381-9989

Attorneys for Plaintiff

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

HORACIO MAYA, JR., individually, and on
 behalf of the State of California and other
 aggrieved persons,

Plaintiff,

v.

TOTAL SAFETY U.S., INC., a Delaware
 corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 25CV466114
 Consolidated with Case No. 25CV460080

*[Assigned for all purposes to Hon. Charles F.
 Adams, Dept. 7]*

**DECLARATION OF PLAINTIFF
 HORACIO MAYA, JR. IN SUPPORT OF
 PLAINTIFF'S MOTION FOR
 PRELIMINARY APPROVAL OF CLASS
 ACTION AND PAGA SETTLEMENT**

PRELIMINARY APPROVAL HEARING

Date:
 Time:
 Dept.: 7

Complaint filed: May 16, 2025
 Trial date: Not Set

DECLARATION OF HORACIO MAYA, JR.

I, Horacio Maya, Jr., hereby declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration in support of my Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for Total Safety U.S., Inc. ("Total Safety") as an hourly-paid, non-exempt rescue technician, rescue lead, and rescue supervisor from approximately April 2022 to approximately October 2024.

3. Based on my experience and knowledge of Total Safety's wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on my own behalf as well as on behalf of other hourly-paid, non-exempt employees of Total Safety.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to other hourly-paid, non-exempt employees of Total Safety. I believe we were all subject to the same employment policies and practices.

5. I do not have any conflicts with other hourly-paid, non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid, non-exempt employees at Total Safety.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid, non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by Total Safety's company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by Total Safety.

7. I have always kept the best interests of the other hourly-paid, non-exempt employees in mind while performing my duties as the named plaintiff in this case. I have been committed throughout the course of this case to vigorously prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the

other hourly-paid, non-exempt employees by initiating this lawsuit, providing documents and information to my attorneys, keeping in regular contact with my attorneys regarding the status of the case, and reviewing the settlement agreement to make sure it was fair.

8. I will continue to actively participate in this lawsuit as necessary and will continue to make myself available to assist in this case moving forward as needed.

9. I do have no actual or potential conflicts of interest with the proposed Administrator, ILYM Group, Inc.

10. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

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

Executed on 3/30/2026, at Los Angeles, California.

Signed by:

Horacio Maya, Jr.

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Horacio Maya, Jr.