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Keileon Hodge, and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KERN

JOSSUE MORENTIN, individually, and on
behalf of other similarly situated employees;
KEILEON HODGE, individually, and on behalf
of other similarly situated employees and
aggrieved employees pursuant to the California
Private Attorneys General Act,

Plaintiffs,

vs.

ANDROS ENGINEERING CORPORATION;
and DOES 1 through 25, inclusive,

Defendants.

Case No. BCV-25-101034

Honorable Bernard C. Barmann, Jr.
Department H

**DECLARATION OF STACEY SHIM ON
BEHALF OF APEX CLASS ACTION LLC,
REGARDING NOTICE AND
SETTLEMENT ADMINISTRATION**

Date: August 20, 2026
Time: 8:30 a.m.
Dept: H
Address: 1215 Truxton Ave.
Bakersfield, CA 93301

Complaint Filed: March 21, 2025
FAC Filed: April 25, 2025
SAC: April 8, 2026
Trial Date: Not Set

DECLARATION OF STACEY SHIM

I, Stacey Shim, declare as follows:

1. I am a resident of the United States of America and am over the age of 18. I am a Case Manager for Apex Class Action, LLC (hereinafter referred to as “Apex”), the professional settlement services provider who has been retained by the Parties’ Counsel and subsequently appointed by the Court to serve as the Settlement Administrator for the above-captioned *Jossue Morentin, et al. v. Andros Engineering Corporation* matter. On behalf of both Apex and myself, I possess the authority to issue this declaration. I am personally acquainted with the information contained herein, and in the event of being summoned to provide testimony, I am fully capable and willing to provide competent testimony regarding these facts.

2. Apex Class Action’s team has been directly involved with class action administration for a combined 150 years and has successfully managed numerous class action cases during that time. Our team comprises experienced professionals with extensive knowledge of class action settlement administration. In addition, Apex Class Action has the necessary technology and infrastructure to efficiently manage large-scale class action cases. We utilize state-of-the-art software and systems to ensure that all aspects of the administration process are executed accurately and efficiently.

3. Apex was engaged by the Parties’ Counsel and subsequently approved and appointed by the Court to provide notification services and settlement administration, pursuant to the terms of the Settlement, in the above-referenced Action. The responsibilities undertaken thus far, as well as those to be fulfilled following the granting of Final Approval of the Settlement, include: (a) printing, mailing, distributing, and posting the Notice of Class Action Settlement, in English and Spanish (referred to as “Class Notice”); (b) receiving and processing Requests for Exclusion, Notice of Objection, and Disputes; (c) calculating individual settlement award amounts; (d) processing and mailing settlement award checks; (e) handling tax withholdings as required by the Settlement and the law; (f) preparing, issuing and filing tax returns and other applicable tax forms; (g) managing the distribution of any unclaimed funds pursuant to the terms of the Settlement; and (h) undertaking additional tasks as mutually agreed upon by the Parties or as ordered by the Court for Apex to perform.

CLASS DATA AND NOTICE PROCESS

4. On April 20, 2026, Class Counsel provided Apex with the Court-approved content for the Class Notice. Apex then generated a draft of the formatted Class Notice, which received approval from the Parties' Counsel prior to mailing.

5. On May 1, 2026, Defendant's counsel provided Apex with the Class List, which contained each Class Member's full name, last known mailing address, Social Security number, and number of Workweeks and Pay Periods. Apex reviewed & cleansed the data for duplicates, discrepancies, and any potential missing information. The Class List consisted of a total of 133 individuals identified as Class Members who worked is 9,450 Workweeks. Accordingly, the Escalator Clause was not triggered.

6. In preparation for the mailing process, all 133 names and addresses listed in the Class List underwent verification and updating against the National Change of Address (NCOA) database maintained by the United States Postal Service (USPS). The purpose of this step was to ensure the accuracy and validity of the Class Members' mailing addresses before sending out the Class Notice. The NCOA database contains records of requested address changes submitted to the USPS. If an updated address was found in the NCOA database, it was utilized for the mailing of the Class Notice. However, in cases where no updated address was found in the NCOA database, the original address provided by Defendant's counsel was used for the mailing of the Class Notice.

7. On May 15, 2026, the Class Notice was sent to all 133 individuals listed in the Class List via U.S First Class Mail. A copy of the Class Notice was also posted to Apex's settlement administration website. A true and correct copy of the Class Notice is attached as **Exhibit A**.

UNDELIVERABLE NOTICES, REMAILED NOTICES, AND SKIP TRACING

8. As of the date of this declaration, our office has received six (6) returned Class Notices as undeliverable. Apex conducted a computerized skip trace on the six (6) returned Class Notices in an attempt to acquire updated addresses for the purpose of re-mailing the Class Notice. This skip-trace effort resulted in obtaining five (5) updated addresses, to which we promptly re-mailed the Class Notices via U.S First Class Mail.

1 9. As of the date of this declaration, one (1) Class Notice has been considered undeliverable
2 as no updated address was found as a result of skip tracing.

3 **REQUESTS FOR EXCLUSION, OBJECTION(S) AND DISPUTE(S)**

4 10. The Response Deadline was June 29, 2026. The extended Response Deadline for Class
5 Members who received a remailed Class Notice was July 14, 2026.

6 11. As of the date of this declaration, Apex has not received any Requests for Exclusion.

7 12. As of the date of this declaration, Apex has not received any Notices of Objection.

8 13. As of the date of this declaration, Apex has not received any Disputes.

9 14. As of the date of this declaration, Apex reports 133 Settlement Class Members,
10 constituting 100% of the Class who worked 9,450 Workweeks during the Class Period.

11 **ALLOCATION OF GROSS SETTLEMENT AMOUNT**

12 15. The Net Settlement Amount available to Settlement Class Members is estimated to be
13 (\$223,010.00), which was calculated by subtracting the requested Class Counsel fees payment
14 (\$157,500.00) the maximum amount allocated for Class Counsel's litigation costs and expenses
15 (\$25,000.00), the requested Enhancement Payments of \$7,500.00 to each of the two Class
16 Representatives (for a total of \$15,000.00), the requested Settlement Administration Costs
17 (\$6,990.00), and the PAGA Amount (\$22,500.00) from the Gross Settlement Amount (\$450,000.00).

18 16. The *highest* Individual Settlement Share to a Settlement Class Member is currently
19 estimated to be approximately \$6,017.73, the *average* Individual Settlement Share is currently
20 estimated to be approximately \$1,676.77, and the *lowest* Individual Settlement Share is currently
21 estimated to be approximately \$23.60. These amounts are subject to employee-side tax and
22 withholdings.

23 17. Pursuant to the Agreement, 35% of the PAGA Amount (\$7,875.00) will be allocated
24 to the PAGA Employees regardless of whether they opt out of the Class settlement. PAGA Employees
25 cannot opt out of the PAGA settlement. There are 69 PAGA Employees who worked a total of 1,651
26 Pay Periods during the PAGA Period.

18. The *highest* Individual PAGA Payment to a PAGA Employee is approximately \$200.33, the *average* Individual PAGA Payment is approximately \$114.13, and the *lowest* Individual PAGA Payment is approximately \$4.77.

ADMINISTRATION COSTS

19. Apex's comprehensive fees and costs for administering this Settlement, covering both incurred and anticipated expenses, amount to \$6,990.00. Apex will proceed with additional tasks related to this matter, such as calculating settlement award payments, issuing and mailing settlement award checks, handling necessary tax filings and reporting on these payments, and any other tasks mutually agreed upon by the Parties or ordered by the Court for Apex to undertake. A copy of Apex's quote is attached hereto as **Exhibit B**.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct, and that this Declaration was executed this 17th day of July 2026, in Irvine, California.


STACEY SHIM