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Attorney for Defendant
REFINED TECHNOLOGIES, INC.

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

JEFFREY YOUNG, individually, and on
behalf of all aggrieved employees pursuant to
the Private Attorneys General Act (“PAGA”),

Plaintiff,

v.

REFINED TECHNOLOGIES, INC., and
DOES 1 through 100, inclusive,

Defendants.

Case No. 30-2022-01279468-CU-OE-CXC

Assigned For All Purposes To:
Hon. Willian D. Claster
Dept. CX104

**DECLARATION OF LAUREN NOYES IN
SUPPORT OF PAGA SETTLEMENT
AGREEMENT**

I, Lauren Noyes, hereby declares as follows:

1. I am the Executive Vice President of Human Resources for Refined Technologies Inc. (“RTI”). I provide this declaration in response to the Court’s April 22, 2025 minute order relating to Plaintiff’s Motion for Approval of the parties’ PAGA settlement. I have personal knowledge of the facts stated herein, unless otherwise indicated, and would testify thereto if called upon to do so.

2. There are 2,199 pay periods at issue. The escalator in the parties’ settlement agreement is not triggered.

3. Exhibit A to the parties' settlement agreement contains a complete list of the "aggrieved employees" as that term is defined in the agreement. Exhibit A contains 115 names, and no other names should be added to this list.

4. All 115 of the "aggrieved employees" in Exhibit A to the parties' settlement agreement speak English such that the notice does not need to be provided in any languages other than English.

5. I understand that the Court has requested a copy of the settlement agreement between RTI and Jeffrey Young relating to Young's individual claims. Because the agreement was reached in conjunction with a confidential arbitration and contains a confidentiality provision, RTI respectfully requests that the Court accept RTI lodging a true and correct copy of the executed settlement agreement so the Court may conduct its review without the document becoming part of the public record.

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

Executed on May ^{5/21/2025}, 2025, at 428 Wildwood Forest Dr., Ste 400, Spring, Texas.

Signed by:

A4814041768043F...

Lauren Noyes

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3 **PROOF OF SERVICE**

4 STATE OF CALIFORNIA, COUNTY OF ORANGE

5 I am employed in the County of Orange, State of California. I am over the age of 18 and not a
6 party to the within action; my business address is 610 Newport Center Drive, Suite 700, Newport
Beach, CA 92660.

7 On May 29, 2025, I served the foregoing document described as **DECLARATION OF**
8 **LAUREN NOYES IN SUPPORT OF PAGA SETTLEMENT AGREEMENT** on the following
person(s) in the manner indicated:

9 **SEE ATTACHED SERVICE LIST**

10 **[X]** (BY ELECTRONIC SERVICE) I am causing the document(s) to be served on the Filing
11 User(s) through the Court's Electronic Filing System.

12 **[]** (BY MAIL) I am familiar with the practice of Call & Jensen for collection and processing of
13 correspondence for mailing with the United States Postal Service. Correspondence so collected and
14 processed is deposited with the United States Postal Service that same day in the ordinary course of
15 business. On this date, a copy of said document was placed in a sealed envelope, with postage fully
prepaid, addressed as set forth herein, and such envelope was placed for collection and mailing at Call
& Jensen, Newport Beach, California, following ordinary business practices.

16 **[]** (BY FEDEX) I am familiar with the practice of Call & Jensen for collection and processing of
17 correspondence for delivery by overnight courier. Correspondence so collected and processed is
18 deposited in a box or other facility regularly maintained by FedEx that same day in the ordinary course
19 of business. On this date, a copy of said document was placed in a sealed envelope designated by
20 FedEx with delivery fees paid or provided for, addressed as set forth herein, and such envelope was
placed for delivery by FedEx at Call & Jensen, Newport Beach, California, following ordinary
business practices.

21 **[]** (BY ELECTRONIC TRANSMISSION) I served electronically from the electronic notification
22 address of jsandoval@calljensen.com the document described above and a copy of this declaration to
23 the person and at the electronic notification address set forth herein. The electronic transmission was
reported as complete and without error.

24 I declare under penalty of perjury under the laws of the State of California that the foregoing is
25 true and correct, and that this declaration was executed on May 29, 2025.

26 
27 Julie Sandoval
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SERVICE LIST

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