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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

ENERSAIN BELTRAN, as an individual and on behalf of all others similarly situated, Plaintiff, vs. THE ROOF MASTERS, INC., a California corporation; and DOES 1 through 100, inclusive, Defendants.	Case No.: 25CU021086C [*Assigned for all purposes to the Hon. Gregory W. Pollack, Dept. C-71*] **DECLARATION OF IAN T. MALLERY IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** Date: November 6, 2026 Time: 9:30 a.m. Dept.: C-71 Action Filed: April 23, 2025 Trial Date: None Set

DECLARATION OF IAN T. MALLERY

I, Ian T. Mallery, declare as follows:

1. I am an associate with Haines Law Group, APC, and counsel for the named Plaintiff Enersain Beltran ("Plaintiff") in the above-captioned matter. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I received a Bachelor of Arts degree from Washington University in St. Louis in 2021, and a Juris Doctor from the University of Minnesota Law School in 2024. I was admitted to the California State Bar in December 2024.

3. During law school, I served as Student Director of the University of Minnesota Clemency Project Clinic and was selected as a Human Rights Fellow with the University of Minnesota Human Rights Center.

4. Prior to and during law school I interned and clerked for the American Civil Liberties Union of Missouri, where I worked on individual and class action civil rights litigation cases, including drafting complaints, memoranda, and briefs on substantive litigation issues. I also participated in a year-long internship with the National Labor Relations Board – Region 18, where I investigated unfair labor practices charges, negotiated settlements, drafted memoranda, and issued complaints on behalf of the General Counsel. Since September 2024, I have worked at Haines Law Group, APC, first as a law clerk then as an associate attorney once I was admitted to the California State Bar in December 2024.

5. Although non-exhaustive, the types of tasks I have performed include: conducting client intakes, drafting complaints, attending court hearings in state and federal courts, corresponding with opposing counsel, drafting and responding to written discovery, taking PMQ depositions, drafting and opposing a variety of motions including motions to compel discovery, motions for class certification, and motions for summary judgment, drafting mediation briefs,

attending mandatory settlement conferences, drafting long-form settlement agreements, and drafting motions for preliminary and final settlement approval.

6. The following is a non-exhaustive list of the class action settlements in which I played a major role assisting Class Counsel, and which have been granted final approval: *Raul Camacho v. Residential Fire Systems, Inc.*, Case No. 30-2015-00775372-CU-OE-CXC, Orange County Superior Court; *Ruben Hernandez v. Neovia Logistics Services, LLC*, Case No. CIVSB2305867, San Bernardino County Superior Court; *Juan David Arreola Carrillo v. KPS Global, LLC*, Case No. 22STCV19527, Los Angeles County Superior Court; *Eric Prado v. Wilwood Engineering*, Case No. 2023CUOE015773, Ventura County Superior Court; *Alfonso Almaraz v. World Oil Corp.*, Case No. 23STCV18296, Los Angeles County Superior Court; *Angel Sanchez v. Ickler Electric Corporation*, Case No. 37-2024-00017621-CU-OE-CTL, San Diego County Superior Court; *John Ledbetter, et al. v. CJ Logistics America, LLC*, Case No. CIVSB2207118, San Bernardino County Superior Court.

7. I have been named as Class Counsel and awarded attorney's fees following a lodestar cross-check in the following cases:

- *Vicente Sandoval v. Cybex Security Solutions, LLC, et al.*, Case No. 30-2024-01398109-CU-OE-CXC, Orange County Superior Court, Honorable Layne H. Melzer, presiding (using an hourly rate of $450 for work performed in 2024-2026).

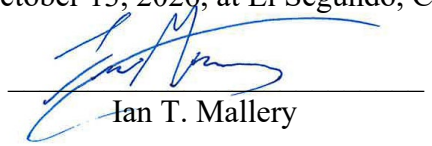
8. As counsel for Plaintiff, I have been closely involved in all aspects of this litigation since its inception. The details of the work completed by Class Counsel in this case are set forth in the declaration of Matthew K. Moen, filed concurrently herewith.

9. I confirm that I do not have any interest or involvement in, and am not affiliated with, the proposed settlement administrator, Apex Class Action Administration, or the proposed *cy pres* recipient, Legal Aid at Work.

10. I am not aware of any other class, representative, or other collective actions in any other court or jurisdiction that assert claims similar to those asserted in this action on behalf of a

class or group of individuals some or all of whom would also be members of the class defined in this action.

I declare under penalty of perjury under the laws of California and the United States that the foregoing is true and correct. Executed on October 13, 2026, at El Segundo, California.



Ian T. Mallery