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Attorneys for Plaintiffs Andrew Aragon, Alice Triplett,
and Dondero Fox, individually, and on behalf of all others
similarly situated.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

ANDREW ARAGON and ALICE TRIPLETT,
individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

STREETPLUS CA, LLC; and DOES 1 through
20, inclusive,

Defendants.

Case No. 22STCV28593

*Assigned for all purposes to:
Hon. Elihu M. Berle, Dept. 6*

**DECLARATION OF DONDERO FOX IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

1 I, Dondero Fox, hereby declare as follows:

2 1. I am one of the named Plaintiffs in the above-entitled matter.

3 2. I am making this declaration in support of Plaintiffs' Motion for Preliminary Approval of
4 Class Action Settlement. I have personal knowledge of the matters stated herein and could and would
5 competently testify thereto.

6 3. I worked for Defendant Streetplus CA, LLC ("Defendant") as a non-exempt employee in
7 the positions of Ambassador and Custodian from approximately June 2018 to November 2021.

8 4. Based on my experience and knowledge of Defendant's wage and hour policies and my
9 familiarity with its employment practices, I worked with my attorneys to bring claims on my behalf and
10 on behalf of the other employees at Defendant.

11 5. I am seeking to become a Class Representative in this case for the purpose of having the
12 Settlement Agreement approved. I believe my experiences are similar to other employees who worked for
13 Defendant. I believe we were all subject to the same employment policies and practices.

14 6. I do not have conflicts with other employees that would hinder my ability to represent
15 them. Therefore, I believe I can adequately represent the other non-exempt employees of Defendant.

16 7. My interests as a named plaintiff in this litigation are not adverse to the interest of the other
17 employees. My interests are the same as the interests of the other employees because we were all subject
18 to the same policies and practices and were similarly injured by Defendant's company-wide policies and
19 practices. I am seeking the same recovery on behalf of myself and other employees, which is to collect
20 unpaid wages, interest, and penalties that are owed by Defendant, pursuant to the Settlement Agreement.

21 8. I have always kept the best interests of the other employees in mind while performing my
22 duties as one of the named plaintiffs in this action. I have been committed throughout the course of this
23 litigation to vigorously prosecuting this case on behalf of myself and the other employees. I believe that I
24 have demonstrated my ability to advocate for the interests of the other employees by initiating this lawsuit,
25 providing documents to my attorneys pertaining to my employment with Defendant, going over the claims
26 and theories with my attorneys, keeping in regular contact with my attorneys regarding the status of this
27 lawsuit, helping my attorneys evaluate the case for settlement, and reviewing the settlement agreement
28 and its terms to make sure it was fair.

9. I will continue to actively participate in this lawsuit as necessary, and will continue to make myself available to assist in this case in the future as needed.

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

Executed on 06/19/2024 in California.

Dondero Fox
Dondero Fox (Jun 19, 2024 18:58 PDT)

Dondero Fox