

1 MONA Z. HANNA, ESQ. (SBN 131439)  
2 MARC R. JACOBS, ESQ. (SBN 185924)  
3 AMANDA K. PAWLYK, ESQ. (SBN 276063)  
4 ALLISON AGUIRRE, ESQ. (SBN 312544)  
5 MICHELMAN & ROBINSON, LLP  
6 17901 Von Karman Ave., 10th Floor  
Irvine, CA 92614  
Telephone: (714) 557-7990  
Facsimile: (714) 557-7991

7 *Attorneys for Defendants*

8 MOTIVE ENERGY, INC., a California corporation;  
9 MOTIVE ENERGY TELECOMMUNICATIONS GROUP, INC., a California corporation;  
ADVANCED CHARGING TECHNOLOGIES, INC., a California corporation

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **FOR THE COUNTY OF ORANGE**

12 WILLIAM CAMPOS; individually, and on  
13 behalf of other members of the general public  
14 similarly situated and on behalf of other  
aggrieved employees pursuant to the  
California Private Attorneys General Act;  
15 JUANITA HERNANDEZ; individually, and  
16 on behalf of other members of the general  
public similarly situated and on behalf of  
17 other aggrieved employees pursuant to the  
California Private Attorneys General Act;

18 Plaintiffs,

19 vs.

20 MOTIVE ENERGY, INC., a California  
21 corporation; MOTIVE ENERGY  
TELECOMMUNICATIONS GROUP, INC.,  
22 a California corporation; ADVANCED  
CHARGING TECHNOLOGIES, INC., a  
23 California corporation; and DOES 1 through  
100, inclusive,

24 Defendants.  
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Case No.: 30-2016-00828352-CU-OE-CXC

Assigned to the Honorable William Cluster  
Department: CX104

**DECLARATION OF LARRY SNEGG  
REGARDING CLASS NOTICE IN  
SUPPORT OF PLAINTIFFS' MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Complaint Filed: January 5, 2016

**DECLARATION OF LARRY SNEGG**

I, Larry Snegg, declare as follows:

1. I am over the age of 18 years and am not a party to this action. The facts set forth below are of my personal knowledge and if properly called to testify as a witness, I could and would competently testify thereto. I was not coerced into signing this declaration, and my employment or continued employment was not conditioned upon my agreeing to sign this declaration.

2. I am the Chief Financial Officer of Motive Energy, Inc. ("MEI"), Motive Energy Telecommunications Group, Inc. ("METG"), and Advanced Charging Technologies, Inc. ("ACT") (collectively, the "Defendants"). In this capacity, I am familiar with the practices of the Defendants.

3. Upon hire, MEI, METG, and ACT employees are given an opportunity to designate their primary language of preference. Based on Defendants' records, I am informed that three MEI, METG, and/or ACT employees have designated "Spanish" as their primary language. The remaining MEI, METG, and ACT employees have designated "English" as their primary language.

4. The Defendants' businesses deal with complex technology systems. Specifically, MEI is a supplier of forklift batteries and forklift battery chargers, as well as battery handling equipment. METG is primarily engaged in the business of designing, building and managing and performing preventative and maintenance work on cell towers, and other wired and wireless networks for wireless service providers. Finally, ACT sells and services forklift battery chargers.

5. All instruction manuals for Defendants' above complex technology systems, which Defendants' employees are expected to follow, are printed in English.

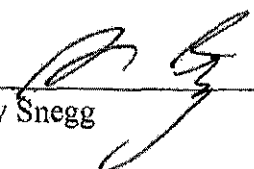
6. Further, all MEI, METG, and ACT employee handbooks are printed in English.

7. The operating systems for all MEI, METG, and ACT employee computers are additionally in English.

8. Based on the above, there is a need to provide the Class Notice packet to putative class members in English and Spanish only.

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

3 Executed this 10<sup>th</sup> day of September, 2018, at ANAHEIM, California.

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