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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

MARK SUAREZ, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

MONZON & SON ENTERPRISES, INC.,
a California Corporation; MONZON &
SON EQUIPMENT TRANSPORT INC., a
California Corporation; and DOES 1
through 20, inclusive;

Defendants.

Case No.: CIVSB2225078

*[Assigned to Hon. Christian Towns, Dept S26,
for all purposes]*

**DECLARATION OF PLAINTIFF MARK
SUAREZ**

Hearing

Date: November 4, 2025

Time: 8:30 a.m.

Dept.: S26

1 I, Mark Suarez, state and declare:

2 1. I am the Plaintiff in the above captioned action and have personal knowledge of
3 all matters stated herein and could competently testify thereto. I make this declaration in support
4 of the motion for preliminary approval of the class action settlement. I believe that the settlement
5 is fair and reasonable and constitutes a fair resolution of the claims alleged.

6 2. When I first retained my attorneys and chose to pursue this case on a class action
7 basis, I understood that I had specific burdens as the "Class Representative," which included: (a)
8 representing the interests of all class members, (2) considering the interests of all class members
9 above my own personal interests, (3) participating actively in the lawsuit, including potential
10 testimony at deposition and trial, and keeping generally aware of the status and progress of the
11 lawsuit. Moreover, I understood that any resolution of the lawsuit is subject to court approval
12 and must be designed in the best interests of the class as a whole.

13 3. Since first initiating this action on behalf of the proposed class, I believe that I
14 have more than adequately performed my duties as a class representative. I have been an active
15 participant in this litigation, including assisting my attorneys in various ways and making myself
16 available when needed. For example, I have assisted my attorneys by compiling and analyzing
17 substantial documentation regarding the claims in this case. I have also helped to explain and
18 discuss the company's practices and their general practices and procedures, locating and
19 analyzing company documents, among others. I have also reviewed all settlement documents and
20 believe that this settlement is fair for the class. Finally, I will continue to take all steps necessary
21 to finalize this settlement and obtain court approval.

22 4. I have no conflicts with the proposed class members, am an adequate and typical
23 class representative since I was subjected to the same company-wide practices in terms of
24 payment of wages, expense reimbursements, among other claims, and will continue to assist with
25 the litigation and prosecute the case on behalf of the other employees.

26 5. I respectfully request that the court preliminarily approve the service award. As
27 outlined above, I have performed substantial services for the Class and helped obtain a highly
28

1 beneficial settlement for my fellow employees. And I have also agreed to waive all of my claims
2 against the company as part of this settlement. At the final approval stage, I will submit an
3 additional declaration setting forth all the work I did for this case, including an estimated number
4 of hours spent assisting the Class and my attorneys.

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct. Executed on Oct 12, 2025, at San Bernardino, California.

7
8 By:


MARK SUAREZ (Oct 12, 2025 10:23:50 PDT)

Mark Suarez