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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

ALEXANDRO MORA, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

PRIME TECH CABINETS, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 30-2022-01289157-CU-OE-CXC

*[Assigned for all purposes to the Hon. Melissa
R. McCormick, Dept. CX104]*

**DECLARATION OF PLAINTIFF
ALEXANDRO MORA IN SUPPORT OF
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: June 20, 2024

Time: 2:00 p.m.

Dept.: CX104

Complaint Filed: October 31, 2022

Trial Date: None Set

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1 which is broader than the release of claims agreed to by other Settlement Class members.

2 5. When this lawsuit was filed, I understood that this lawsuit could benefit former
3 and current employees by helping to recover their unpaid wages, unpaid meal and rest period
4 premiums, and other penalties. I knew there was a risk that I could be liable for PTC's costs if we
5 lost the case. I accepted this risk because I wanted PTC to pay its current and former employees
6 for their unpaid wages and penalties. Even though I understood that filing a lawsuit is a public
7 record, I accepted that burden in order to help former, current, and future employees. As far as I
8 am aware, I have no actual or potential conflicts with any of the Settlement Class members.

9 6. I understand that my attorneys will request that the Court approve a Class
10 Representative Enhancement Payment of \$7,500.00 for my efforts on behalf of the Settlement
11 Class. I believe this amount is reasonable based on the amount of time and effort I have devoted
12 to this case and the risks I have undertaken as a class representative, and my general release of
13 claims, as described above. My support for the Settlement is not contingent on me receiving this
14 enhancement payment.

15 I declare under penalty of perjury under the laws of the State of California and the United
16 States that the foregoing is true and correct. Executed on 3/24/2024, 2024 in
17 Santa Ana, California.

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19 ALEXANDRO MORA
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