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Attorneys for Plaintiff ANGELICA NGUYEN, Individually, and on behalf of other members of the general public similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO**

ANGELICA NGUYEN, Individually, and on
behalf of other members of the general public
similarly situated,

Plaintiff

v.

MICNAN LLC, a Limited Liability Company
doing business in California; TOOLEY OIL
COMPANY, a California Corporation;
TOOLEY PROPERTIES, LLC., a California
Limited Liability Company; and DOES 1-10,
inclusive

Defendants

CASE NO. 25CV015058

**DECLARATION OF ANGELICA NGUYEN
IN SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF
SETTLEMENT, AND CERTIFICATION
OF PROVISIONAL SETTLEMENT CLASS**

Date: August 21, 2026
Time: 9:00 a.m.
Dept.: 8A
Judge: Hon. Jill H. Talley

RESERVATION NO. A-15058-001

1 I, Angelica Nguyen, hereby declare as follows:

- 2 1. I am the named Plaintiff in the above-captioned matter. I make this declaration in support of
3 Plaintiff's Unopposed Motion for Preliminary Approval of Settlement, and Certification of
4 Provisional Settlement Class.
- 5 2. I am personally familiar with the facts set forth in this declaration, and if called to testify as a
6 witness I could and would do so.
- 7 3. To my recollection, I personally met with my Attorneys on at least 4 occasions, Several of
8 those meetings lasted in excess of 1 hour.
- 9 4. During those meetings, I would review and explain numerous documents turned over by
10 Defendants from my employment. I would also explain my (as well as others') role during
11 work. I also helped identify numerous other employees who could support the claims I was
12 making in this lawsuit.
- 13 5. I also spoke with my attorneys on the phone on at least 15 occasions.
- 14 6. I also spent significant time reviewing the settlement documentation and discussing the
15 settlement with my attorneys.
- 16 7. In total, I estimate that I spent at least 35 hours related to the above mentioned tasks directly
17 working with my attorneys. I also spent at least another 5-6 hours of my own time gathering
18 evidence and outlining issues that I later shared with my attorneys.
- 19 8. When I decided to move forward with this case, I was counseled by my attorneys of the
20 potential stigma of being a Class Representative in a representative action, as this is a publicly
21 filed lawsuit.
- 22 9. I was also advised when I brought this case that had we lost, I could have been personally
23 liable for paying all of Defendant's costs. I was further advised this could be well into the tens
24 of thousands of dollars on this type of case.

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1 10. Despite these risks I was committed to achieving a settlement that would benefit all employees
2 working for MICNAN LLC; TOOLEY OIL COMPANY; and/or TOOLEY PROPERTIES,
3 LLC.
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5 I declare under penalty of perjury under the laws of the State of California that the foregoing
6 is true and correct. Executed this 23 day of April, 2026.
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9 _____
10 Angelica Nguyen
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Title	Declaration Signature Requested -Nguyen 7477
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SENT

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Sent for signature to Angelica Nguyen
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Viewed by Angelica Nguyen (amnguyen430@gmail.com)
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SIGNED

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04 / 23 / 2026

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The document has been completed.