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Attorneys for Defendant
HUGHES-NELSON PAINTING INC. d/b/a APEX IMAGING SERVICES INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

LESLIE MORALES, individually, and on behalf of other members of the general public similarly situated and as an Aggrieved Employee pursuant to the Private Attorneys General Act ("PAGA"); and BRIANNA TORRES-CERVANTES, individually and on behalf of other members of the general public similarly situated,

Plaintiff,

v.

HUGHES-NELSON PAINTING, INC. d/b/a APEX IMAGING SERVICES INC., a California Corporation; and DOES 1 through 10, inclusive,

Defendant.

CASE NO.: 25STCV16345
Civil Unlimited Jurisdiction

Assigned for all purposes to the Honorable Timothy Patrick Dillon, Dept. 15

DECLARATION OF HAL HARGRAVE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Date: February 10, 2027
Time: 10:00 a.m.

Complaint Filed: June 5, 2025
SAC Filed: August 28, 2026
Trial Date: Not Set

DECLARATION OF HAL HARGRAVE

I, Hal Hargrave, hereby declare and state as follows:

1. I am the Chief Executive Officer of Defendant Hughes-Nelson Painting, Inc. d/b/a Apex Imaging Services Inc. ("Apex"). I make this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement. I have personal knowledge of the facts set forth herein, and if called upon to testify thereto, I could and would competently do so under oath.

2. Currently, Apex does not have any actual or potential conflict of interest with Apex Class Action Administration LLC.

3. There are currently no other pending matters that would be extinguished or adversely affected by the Settlement.

4. Apex estimated there were a total of 3,002 PAGA Pay Periods as of the March 19, 2026, mediation. Paragraph 4.1.1 of the Parties' Settlement Agreement provides that if PAGA Pay Periods exceed 3,302, the Gross Settlement Amount increases proportionately unless Defendant elects to end the Class Period and the PAGA Period on the date PAGA Pay Periods reach 3,302. In connection with Plaintiff's Motion for Preliminary Approval, Apex analyzed its time and pay records and determined that as of September 1, 2026, the number of PAGA Pay Periods did not exceed 3,302. Apex further calculated that the escalator provision will be triggered as of the next pay period – i.e., on or around September 4, 2026. As of September 1, 2026, there were 3,272 PAGA Pay Periods worked by 64 allegedly Aggrieved Employees, and 2,692 Workweeks worked by 88 putative Class Members. PAGA Pay Periods would have exceeded 3,302 in the pay period ending on or about September 4, 2026. Pursuant to Paragraph 4.1.1 of the Parties' Settlement Agreement, Apex elects to end both the Class Period and the PAGA Period on September 1, 2026.

5. Apex employees who hold the positions at issue in this litigation, including Accounting Associate 1, Accounting Associate 2, Administrative Assistant, Project Coordinator 1, Project Coordinator 2, as well as functionally similar positions read and write in English. Further Apex's hiring, training, and personnel communications for these roles were conducted in English. As a result, Apex does not believe there is any reason for communications to the class members and aggrieved employees to be in Spanish.

/ / /

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

Executed on November __, 2026 at Pomona, California.

Hal Hargrave (Nov 17, 2026 06:24:36 PST)

HAL HARGRAVE

H. Hargrave Decl ISO Pltfs' Mtn for Prelim Approval of Class and PAGA Settlement

Final Audit Report 2026-11-17

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"H. Hargrave Decl ISO Pltfs' Mtn for Prelim Approval of Class an d PAGA Settlement" History

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