

1 ZACK I. DOMB, SBN 265185
E-Mail zack@dombrauchwerger.com
2 DEVIN RAUCHWERGER, SBN 274234
E-Mail devin@dombrauchwerger.com
3 ERIC Y. HAHN, SBN 311771
E-Mail eric@dombrauchwerger.com
4 CURTIS P. DAVIS, SBN 323353
E-Mail curtis@dombrauchwerger.com
5 **DOMB & RAUCHWERGER LLP**
1055 East Colorado Blvd., Fifth Floor
6 Pasadena, California 91106
Telephone: (213) 537-9225
7

8 JOANNA GHOSH, SBN 272479
E-Mail: joanna@calljustice.com
9 BRIAN ST. JOHN, SBN 304112
E-Mail: brian@calljustice.com
ERICA STEPANIAN, SBN 362054
10 E-Mail: erica@calljustice.com
LAWYERS for JUSTICE, PC
11 450 N Brand Blvd, Ste 900
Glendale, CA 91203
12 Tel: (818) 265-1020 / Fax: (818) 265-1021

13 Attorneys for Plaintiffs
14 Afiya Porter, Monica G. Fitzmaurice, and the Proposed Class

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **FOR THE COUNTY OF ALAMEDA**

17 AFIYA PORTER, individually, MONICA
18 G. FITZMAURICE, individually, and on
behalf of other members of the general
19 public similarly situated;

20 Plaintiffs,
21 vs.

22 TRIUMVIRATE ENVIRONMENTAL, IN
C., a Massachusetts corporation; and DOES
23 1 through 100, inclusive,
24 Defendants.

Case No.: 24CV092940

**DECLARATION OF MONICA
FITZMAURICE IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Hearing Information:

Date: January 29, 2026
Time: 9:00 AM
Dept.: 24

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

1. I am over the age of 18 years old and a resident of the United States. I have personal knowledge of the matters set forth herein, and if called upon to testify, I could and would do so competently. I make this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement.

3. I have been employed by Defendant Triumvirate Environmental, Inc., since approximately 2016.

5. I understand that as a Class Representative I have an important duty to look out for the best interests of the Class. I understood from the start of considering this case based on my discussions with my lawyers that I would have to take on significant responsibilities and burdens for the benefit of the Class, which could include having my deposition taken to give testimony under oath, that I could face the possibility of subpoenas being issued to former and current employers, and that I may testify in Court for the benefit of not only myself but the other members of the Class. I have had numerous conversations with my attorneys regarding this case in order to provide them with the information and documents that they needed to handle the matter. I answered numerous questions that my attorneys had about the case, and reviewed the Amended complaint when it was filed, and reviewed the settlement agreement.

6. I have taken my responsibility as a Class Representative seriously and will continue to do so. I have learned about the laws relating to the issues in this Action, including laws about minimum wages, overtime, meal breaks and rest breaks.

7. I know of no conflicts between my interests and goals and the interests and goals of anyone else in the Class.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed on January 6, 2026, in San Diego, California.

Monica B Fitzmaurice
MONICA FITZMAURICE