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Attorneys for Plaintiffs and the proposed class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

JAMES SARAMI, DOUGLAS STUMVOLL;
ANDREY TARASOV, as individuals, on
behalf of themselves and others similarly
situated

PLAINTIFFS,

v.

TEND EXCHANGE SUBSIDIARY, LLC;
TEND EXCHANGE & DELAWARE
TENDER STAFFING, LLC; and DOES 1 thru
50, inclusive,

DEFENDANTS.

CASE NO. 23STCV02139

[Case Assigned for All Purposes to Hon.
William F. Highberger in Dept. 10]

**DECLARATION OF DOUGLAS
STUMVOLL IN SUPPORT OF FINAL
APPROVAL OF CLASS SETTLEMENT**

Date: January 12, 2026

Time: 2:30 PM

Dept.: 10

Complaint Filed: January 31, 2023

Trial Date: None Set

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DECLARATION OF DOUGLAS STUMVOLL

I, Douglas Stumvoll, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and a named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant Tend Exchange Subsidiary, LLC; Tend Exchange & Delaware Tender Staffing, LLC (“Defendants”) as an hourly employee.

3. I brought this lawsuit, on behalf of myself and all other Class Members, against Defendants because I believe that Defendants did not provide all wages and/or overtime pay due, failed to provide meal and/or rest breaks, failed to reimburse necessary business expenses, failed to issue accurate itemized wage statements, and failed to pay all wages due at the time of resignation/termination to me and other employees.

4. I understand that I am representing other Tend employees and I believe that I am able to represent them well.

5. Before joining as a Plaintiff this action, on December 18, 2023, I first contacted experienced attorneys who are very experienced with these types of lawsuits. I learned that a class action had already been filed that covered the potential violations of law that I was concerned about. I then worked with counsel to make the decision to be added as a representative in this matter. Once I decided to move forward, I compiled any relevant documents from my employment to assist my attorneys in litigating this case.

6. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the Settlement as needed. Additional work in connection with this matter includes providing information to my attorneys regarding my employment with Defendant, staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my attorneys’ various communications regarding this matter, making myself available for a full-day mediation in October 2023, and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of the Class

1 Members.

2 7. I estimate the total time spent in connection with this matter is approximately 25-
3 30 hours.

4 8. I have worked to actively represent the other Class Members and their interests.

5 9. I have always kept the Class Members interests at heart in this litigation.

6 10. I am prepared to continue assisting with this litigation and am committed to
7 achieving the best possible results for the Class.

8 11. I believe that the class action settlement obtained on behalf of the Class is fair and
9 reasonable in light of the issues involved in this case. As mentioned above, I reviewed and
10 discussed the Settlement Agreement with my attorneys and asked them questions about it to ensure
11 that I understood its terms and what it would mean for all of the class members.

12 12. I believe that I have fairly represented the absent Class and request that the Court
13 finally approve this settlement and confirm me as Class Representative.

14 13. I am not aware of any conflicts of interest that prevent me from being confirmed as
15 Class Representative in this Lawsuit. I am not related in any way to my attorneys or to any other
16 member of the firm that is representing me. I have no business dealings or other involvement
17 beyond this lawsuit and this representation. I have not been promised any money or inducement
18 to serve as Class Representative in this Lawsuit.

19 14. It is my opinion that the settlement agreement provides for a fair and adequate
20 enhancement for me as a Class Representative, in the amount of \$7,500.00. I believe that this is
21 fair and reasonable in light of all of the work that I have performed in my role as Class
22 Representative. As Class Representative, I have actively participated in all stages of the litigation,
23 as detailed above, and have always maintained the best interests of the Class while performing my
24 Class Representative duties.

25 15. It is also my opinion that the Class Representative enhancement is fair, reasonable,
26 and adequate because, in addition to the many hours spent participating in the prosecution of this
27 case, I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we
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1 were unsuccessful in this Lawsuit. Likewise, I risk the potential stigma of being a Class
2 Representative in a class action labor dispute, which may affect my future employability.

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

5 Executed this 20 day of November, 2025 at Los Angeles,
6 California. (City)

7 
8 _____
9 Douglas Stumvoll

(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On November 25, 2025, I served all interested parties in this action the following documents described as: **DECLARATION OF DOUGLAS STUMVOLL IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

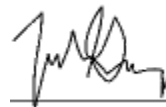
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Jenny Carmona
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400 South Hope Street, Suite 1200
Los Angeles, CA 90071

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] BY ELECTRONIC MAIL THROUGH CASE ANYWHERE: On interested parties set forth on the attached service list.

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on November 25, 2025, at West Hollywood, California.



Taylor Gregg