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Attorneys for Defendant
CORESLAB STRUCTURES (L.A.) INC.

SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE, RIVERSIDE HISTORIC COURTHOUSE

ESTEBAN ALDANA, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

CORESLAB STRUCTURES (L.A.) INC., a
California Corporation; and DOES 1 through
20, inclusive;

Defendants.

CASE NO.: CVRI2300287

ASSIGNED FOR ALL PURPOSES TO
THE HONORABLE HAROLD W. HOPP
DEPARTMENT 1

**DECLARATION OF JON CLAUSEN IN
CONNECTION WITH PLAINTIFF
ESTEBAN ALDANA'S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: March 14, 2024

Time: 8:30 AM

Dept.: 1

Complaint Filed: January 19, 2023

Trial Date: None Set

I, Jon Clausen, declare as follows:

2. In my capacity as Vice President and General Manager, I am familiar with the regular business activities that Defendant conducts during its normal course of business related to its personnel, including the hiring, on-boarding, termination and payroll-related facts. Also, in my capacity as Vice President and General Manager, I have access to, and am authorized to review, the personnel files, employment history, and payroll history of Defendant's employees. I have an understanding of not only the kinds of records that Defendant maintains, but of the general business practices that Defendant uses to obtain, maintain, review and analyze such records.

3. Based on my personal knowledge, the typical Class Member in this action is over the age of 18, has at least a high school diploma, and speaks, understands and writes English without difficulty.

Executed on February 13, 2024 at Perris, California.


Jon Clausen