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By S. Drew, Deputy Clerk

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

PAUL LOWE, an individual; on behalf of
himself and all others similarly situated and the
general public,

Plaintiffs,

v.

RAPID RELIABLE TESTING, LLC, a
Delaware limited liability company; RAPID
RELIABLE TESTING CA, LLC, a California
limited liability company; and DOES 1 to 100,
inclusive,

Defendants.

Case No. 23STCV07047

[Assigned for All Purposes to:
The Hon. Theresa M. Traber, Dept. 1]

**DECLARATION OF PAUL LOWE IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: February 6, 2026

Time: 10:30 a.m.

Dept: 1

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1 I, PAUL LOWE, declare as follows:

2 1. I am over the age of eighteen and am the Class Representative Plaintiff in the
3 matter *Paul Lowe v. Rapid Reliable Testing, LLC, et al.* The foregoing is based upon my
4 personal knowledge and, if called as a witness, I could and would competently testify thereto.

5 2. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval
6 of Class Action Settlement.

7 3. I was previously employed by Defendant between October 2021 and November
8 2022 and worked in California as an operations supervisor. During my time working for
9 Defendant, I was subjected to the same wage and hour policies and practices that are at issue in
10 this case, including the Defendant's practice of failing to pay employees all wages owed, failing
11 to provide meal periods, failing to authorize and permit rest periods, failing to provide accurate
12 wage statements, failing to reimburse business expenses and related issues.

13 4. Since the beginning of this case, I have been closely involved in assisting my
14 attorneys with prosecuting this action and have done so diligently and aggressively since I filed
15 the Complaint in March 2023. Prior to getting involved in this case, I spoke with my attorneys
16 for many hours to understand the nature of the case and shared with my attorneys the wage and
17 hour violations that I experienced at Defendant. Before becoming involved in the case, I also
18 spent several hours acquainting myself with my duties and obligations as a class action
19 representative, and my role in prosecuting this case against Defendant.

20 5. After I became involved in this case, I assisted my attorneys in reviewing and
21 understanding the documents exchanged in discovery. I reviewed many of Defendant's payroll
22 records and policy documents with my attorneys and answered my attorneys' questions relating
23 to those documents.

24 6. As the parties were negotiating settlement of this case, I stayed in communication
25 with my attorneys throughout this time period and worked with my attorneys in answering any
26 questions they had to help them to achieve the best results possible to resolve this matter through
27 settlement. I made sure to always make myself available to answer any questions they had and
28 respond to case issues that came up throughout the settlement negotiation process.

1 7. On February 5, 2025, the parties attended Mediation in this case, and I was on-
2 call for the mediation, and spoke with my attorneys throughout the day to ensure that a fair
3 settlement was reached. Since the parties reached agreement on settlement, I have
4 communicated with my attorneys regarding the settlement terms, and spent many hours
5 reviewing the lengthy settlement agreement, and ensuring that the settlement agreement is fair to
6 all class members.

7 8. As detailed above, I actively participated in all stages of litigation and have been
8 continuously apprised of all aspects of this case.

9 9. I have been diligent, and I believe I acted above and beyond that which was
10 expected of me as a Class Representative throughout all stages of the litigation, up to and
11 including the settlement of this Class Action. I understand and agree to my fiduciary obligations
12 and responsibilities as a class representative, and I have agreed to act in the best interests of the
13 class in pursuing the claims alleged in this case. I also have no claims that are antagonistic to the
14 class, as my interests are aligned with all other class members to obtain the best possible
15 resolution for the class.

16 10. I believe that the Class Action Settlement and PAGA representative settlement in
17 the gross amount of \$220,000 obtained on behalf of the class is very good in view of the
18 complex and varied issues involved with the case. I took into consideration the strengths and
19 weaknesses of the various claims for all employees and along with my attorneys and agreed to
20 the settlement. I was prepared to sit for trial, if necessary. I strongly support the settlement in
21 this matter. When I was contemplating settlement, I always kept the best interests of the class
22 and the aggrieved employees in mind over my own and I was not willing to settle the matter until
23 I felt it was in the best interests of all class members and aggrieved employees.

24 11. In addition to performing work on this matter, I assumed a substantial risk in
25 serving as a class representative if the Defendant prevailed in this case. My willingness to
26 assume the financial risk was and is significant. Although I was confident in the merits of this
27 lawsuit, I do not have any significant savings to speak of, and bringing this lawsuit was a serious
28 commitment on my behalf and exposed myself to considerable risk. My attorneys have advised

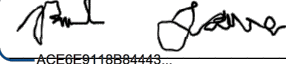
me that California law provides that the losing party must pay the prevailing party's costs. As such, if the Defendant had prevailed in this case, I would have been subjected to a cost award in the amount of tens of thousands of dollars. Notwithstanding these risks, I chose to serve in my capacity as Class Representative and pursue all claims against Defendant.

12. Given the above, I believe a \$7,500 enhancement fee and general release payment is appropriate, fair and reasonable in this case.

13. I have been informed of and previously agreed to, in writing, of the attorneys' fee sharing arrangement between Bartz Law Group APC (Bartz), United Employees Law Group PC (UELG), and Bibiyan Law Group P.C. (BLG), whereby Bartz/UELG are entitled to receive two-thirds of the attorneys' fees received in this case, and BLG is entitled to receive one-third of the attorneys' fees received.

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

Executed on August 26, 2025, in the City of Torrance, State of California.

DocuSigned by:

 ACE6E9118B84443...
 Paul Lowe