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9 Attorneys for Plaintiff DAVID ALEGRIA, Individually, and on behalf of other members of the general
10 public similarly situated

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **COUNTY OF SAN BERNARDINO**

13 DAVID ALEGRIA, Individually, and on
14 behalf of other members of the general public
15 similarly situated,

16 Plaintiff

17 v.

18 NEXEN TIRE AMERICA, INC., a Maryland
19 Corporation; and DOES 1-10, inclusive,

20 Defendants

CASE NO. CIVSB2304566

**DECLARATION OF MAURO MORENO IN
SUPPORT OF PLAINTIFF'S *UNOPPOSED*
MOTION FOR FINAL APPROVAL OF (1)
CLASS ACTION SETTLEMENT; (2)
ATTORNEYS' FEES AND COSTS; and (3)
CLASS REPRESENTATIVE AWARD**

Date: October 14, 2026

Time: 8:30 a.m.

Judge: Hon. Kevin C. Lee

Dept.: S26

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Declaration

1 I, Mauro Moreno, hereby declare as follows:

- 2 1. I am a Plaintiff in the above-captioned matter. I make this declaration in support of Plaintiffs'
3 Unopposed Motion for Final Approval of Class Action Settlement, Attorneys Fees and Costs,
4 and Class Representative Award.
- 5 2. I am personally familiar with the facts set forth in this declaration, and if called to testify as a
6 witness I could and would do so.
- 7 3. To my recollection, I personally met with my Attorneys on zoom for at least 6 occasions.
8 Several of those meetings lasted in excess of 1 hour.
- 9 4. During these meetings, I would review and explain numerous documents turned over by
10 Defendants from my employment. I would also explain my (as well as others') role during
11 work. I also helped identify numerous other employees who could support the claims I was
12 making in this lawsuit. I contacted many of these individuals myself to verify their willingness
13 to participate.
- 14 5. I also spoke with my attorneys on the phone on at least 10 other occasions.
- 15 6. I sat for a half day of deposition in this case. In preparation for these depositions, I spent
16 several hours preparing with my attorneys. I also spent significant time reviewing the
17 settlement documentation and discussing the settlement with my attorneys.
- 18 7. In total, I estimate that I spent at least 35 hours related to the above mentioned tasks directly
19 working with my attorneys. I also spent at least another 4-5 hours of my own time gathering
20 evidence and outlining issues that I later shared with my attorneys.
- 21 8. When I decided to move forward with this case, I was counseled by my attorneys of the
22 potential stigma of being a Class Representative in a class action dispute, as this is a publicly
23 filed lawsuit.
- 24 9. I was also advised when I brought this case that had we lost, I could have been personally
25 liable for paying all of Defendants' costs. I was further advised this could be well into the tens
26 of thousands of dollars on this type of case.

1 10. Despite these risks I was committed to achieving a settlement that would benefit all employees
2 working for Nexen Tire America, Inc.

3
4 I declare under penalty of perjury under the laws of the State of California that the foregoing
5 is true and correct. Executed this 18 day of September, 2026 at San Bernardino, California.

6 Mauro Moreno

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8 MAURO MORENO

Title	Declaration for Final Approval
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Sent for signature to Mauro Moreno (mfmoreno01108@gmail.com)
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The document has been completed.