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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SONOMA

JUAN RODRIGUEZ, on behalf of himself and all others similarly situated,

Plaintiff,

v.

JACKSON-MITCHELL, INC., a California Corporation; and DOES 1-50, inclusive.

Defendants.

CASE NO.:25CV06343

Assigned to Hon. Oscar A. Pardo

DECLARATION OF JUAN RODRIGUEZ IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

HEARING INFORMATION

Date:
Time:
Dept.:

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DECLARATION OF JUAN RODRIGUEZ

I, Juan Rodriguez, state and declare:

1. I am the Plaintiff in the above-captioned action and have personal knowledge of all matters stated herein, and could competently testify thereto. I make this declaration in support of the motion for preliminary approval of the class action settlement.

2. Based on my participation in this litigation, discussions with counsel, and understanding of the strengths and weaknesses of the claims and defenses, I believe the settlement is fair, reasonable, and in the best interests of the class.

3. During my employment with Defendant, several issues concerned me, which I thought did not comply with California law, such as not being paid for all minimum and overtime wages, meal and rest break requirements, failure to pay all sick time, wage statement violations, waiting time violations, failure to reimburse necessary business expenses, and unfair competition. Although I was concerned that suing my employer could affect future employment opportunities, I ultimately decided to pursue this action because I believed Defendant's practices harmed employees and should be challenged.

4. When I first retained my attorneys and chose to pursue this case on a class action basis, I understood that I had specific burdens as the "Class Representative," which included: (1) representing the interests of all Class Members; (2) placing the interests of the Class above my own; (3) actively participating in the litigation, including depositions, and keeping generally aware of the status and progress of the lawsuit. Moreover, I understood that any resolution of the lawsuit is subject to court approval and must be designed in the best interests of the class as a whole.

5. I respectfully request that the Court approve the requested service award for the following reasons.

6. First, I devoted a substantial amount of time to assisting Class Counsel and performed significant services on behalf of the Settlement Class, all of which contributed to achieving the proposed Settlement.

7. On or about September 8, 2025, I initiated a Class Representative Action Complaint in the Superior Court of California, Sonoma County. This action represents my interests and those of

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all other current and former non-exempt employees similarly situated. Subsequently, the complaint was amended to include a cause of action under the Private Attorneys General Act ("PAGA") on behalf of myself, the State of California, and other similarly aggrieved employees.

8. I estimate that I devoted approximately 35 to 40 hours assisting Class Counsel. This included multiple telephone conferences, meetings, emails, text messages, reviewing documents, discussing Defendant's payroll and break practices, locating relevant records, assisting counsel in evaluating the claims, preparing for mediation, reviewing settlement proposals, and communicating with counsel throughout the litigation. I also remained available to respond promptly to my attorneys' questions and provide additional information whenever requested throughout the litigation.

9. In addition to the time described above, I assisted Class Counsel in evaluating Defendant's policies and practices, identifying relevant witnesses, reviewing documents and records, assessing the strengths and weaknesses of the claims and defenses, reviewing Defendant's settlement proposals, and evaluating the fairness of the proposed Settlement before authorizing its acceptance. I remained actively involved throughout the litigation and was available whenever counsel required information or assistance.

10. My work also continued after the mediations, as I reviewed settlement agreements and other related documents and maintained communication with my lawyers throughout the settlement approval process. This litigation remained pending for over a year, during which time I remained actively involved and available to assist counsel whenever needed.

11. Second, I respectfully request that the Court approve the agreed-upon service award because I agreed to set aside my interests and put the class's interests ahead of or on par with my own. In doing so, and by successfully bringing this case as a class action, I helped obtain a substantial non-reversionary settlement that provides meaningful monetary relief to approximately 143 current and former non-exempt employees.

12. Third, by serving as the named Plaintiff and Class Representative, I assumed responsibilities and burdens that absent class members did not. My name became publicly associated with this lawsuit, and I understood that my participation would be part of the public record. I undertook these responsibilities despite concerns that being publicly identified as the plaintiff in a

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lawsuit against my former employer could affect future employment opportunities. I assumed these responsibilities without any guarantee of recovery or success.

13. Fourth, I understood that litigation involves substantial risks and that there was no guarantee of any recovery for the Class or me. Despite those risks, I chose to continue serving as the Class Representative because I believed the claims asserted in this action were important and that employees deserved an opportunity to seek relief.

14. Throughout this litigation, I remained committed to representing the interests of the class and aggrieved employees. I voluntarily devoted significant time and effort to assisting counsel and pursuing relief on behalf of the class. I respectfully request that the Court consider these efforts in evaluating my request for a service award.

15. At all times during this litigation, I understood that my responsibility as Class Representative was to act in the best interests of the Class as a whole. I remained informed regarding the status of the case, communicated regularly with counsel, participated in evaluating the proposed Settlement before authorizing its acceptance, and believe the Settlement is fair, reasonable, and in the best interests of the Settlement Class.

16. In agreeing to serve as the Class Representative, I devoted my time without any assurance that I would receive compensation for those efforts. I understood that if the Action was unsuccessful, I could receive nothing despite the time and effort I invested on behalf of the Settlement Class. Nevertheless, I continued to fulfill my responsibilities because I believed it was important to pursue relief for the affected employees.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 11/12/2026, at Santa Rosa, California.

Signed by:
Juan Rodrigue
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Juan Rodriguez