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Attorneys for Plaintiff LLOYD RODRIGUEZ, in a Representative capacity only, and on behalf of other members of the general public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF IMPERIAL

LLOYD RODRIGUEZ, in a Representative capacity only, and on behalf of other members of the general public similarly situated

Plaintiff

v.

LEAD STAR SECURITY, INC. a California Corporation; and DOES 1-10, inclusive

Defendants

CASE NO. ECU002939

**DECLARATION OF LLOYD RODRIGUEZ
IN SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR PAGA
SETTLEMENT APPROVAL**

Date: March 19, 2026

Time: 8:30 a.m.

Dept.: 9

Judge: Hon. L. Brooks Anderholt

1 I, LLOYD RODRIGUEZ, declare as follows:

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

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26
27 ///

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Declaration

-1-

1 10. Despite these risks I was committed to achieving a settlement that would benefit all employees
2 working for LEADSTAR SECURITY, 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 25th day of February, 2026 at El Centro, California.

6
7 

8 LLOYD RODRIGUEZ

Title	Declaration Signature Requested -Rodriguez 7330
File name	Rodriguez_Decl_Final.pdf
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Status	● Signed

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SENT

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Sent for signature to Lloyd Rodriguez
(lloydrodriguez70@gmail.com) from
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VIEWED

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Viewed by Lloyd Rodriguez (lloydrodriguez70@gmail.com)
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SIGNED

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The document has been completed.