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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF SAN DIEGO**

RONALD FIGUEROA, as an individual and  
on behalf of all others similarly situated,

Plaintiff,

vs.

SOLAR TURBINES INCORPORATED, a  
Delaware corporation; and DOES 1 through  
100,

Defendants.

CASE NO.: 37-2023-00016512-CU-OE-CTL

*[Case assigned for all purposes to the Hon.  
Gregory W. Pollack, Dept. C-71]*

**PROOF OF SERVICE**

Action Filed: April 20, 2023  
Trial Date: None Set

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San Diego County Superior Court Case No. 37-2023-00016512-CU-OE-CTL

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is [X] 2155 Campus Drive, Suite 180, El Segundo, California 90245.

On May 7, 2025, I served the foregoing document(s) described as:

**PLAINTIFF’S NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT, ATTORNEYS’ FEES AND COSTS, AND CLASS  
REPRESENTATIVE SERVICE AWARD**

**[PROPOSED] JUDGMENT AND ORDER GRANTING PLAINTIFF'S MOTION FOR  
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

**DECLARATION OF ANDREW J. ROWBOTHAM IN SUPPORT OF PLAINTIFF'S  
NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT, ATTORNEYS' FEES AND COSTS, AND CLASS  
REPRESENTATIVE SERVICE AWARD**

**DECLARATION OF FLETCHER W. SCHMIDT IN SUPPORT OF PLAINTIFF'S  
NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT, ATTORNEYS' FEES AND COSTS, AND CLASS  
REPRESENTATIVE SERVICE AWARD**

## DECLARATION OF RONALD FIGUEROA IN SUPPORT OF APPROVAL OF CLASS ACTION SETTLEMENT

**DECLARATION OF MADELY NAVA OF APEX CLASS ACTION, LLC, IN SUPPORT  
OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

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on the interested party(ies) in this action as follows:

Jody A. Landry, Esq.

Email: jlandry@littler.com

Carrie A. Stringham, Esq.

Email: cstringham@littler.com

**LITTLER MENDELSON, P.C.**

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Attorneys for Defendant SOLAR TURBINES INCORPORATED

☒ (BY ELECTRONIC MAIL) I am "readily familiar" with Haines Law Group, APC's practice of serving documents via electronic mail. Under the practice, pursuant to an agreement between Haines Law Group, APC, and the party(ies) listed above, the document is being sent via electronic mail to the email address last provided by the individual to whom the aforementioned document is being served.

☒ (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 7, 2025, at El Segundo, California.

  
\_\_\_\_\_  
Valerina Cifuentes