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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

DANIEL ENRIQUEZ ULLOA, individually, and
on behalf of all others similarly situated,

Plaintiff,

v.

MGE UNDERGROUND, INC., a California
Corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: 22CV403855

*Assigned for all purposes to:
Hon. Theodore C. Zayner, Dept. 19*

**DECLARATION OF DANIEL
ENRIQUEZ ULLOA IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

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26 Attorneys for Plaintiff Daniel Enriquez-Ulloa

1 I, Daniel Enriquez-Ulloa, hereby declare as follows:

2 1. I have personal knowledge of the facts set forth herein and if called upon to testify,
3 I could and would do so competently under oath. I make this declaration in support of my Motion
4 for Preliminary Approval of Class Action and PAGA Settlement.

5 2. I worked for MGE Underground, Inc. (“Defendant”) as an hourly-paid, non-exempt
6 nonunion construction project coordinator from around January 2021 to approximately January
7 2022.

8 3. Based on my experience and knowledge of Defendant’s wage and hour policies and
9 my familiarity with its employment practices, I worked with my attorneys to bring claims on my
10 own behalf as well as on behalf of other hourly-paid, non-exempt employees of Defendant.

11 4. I am seeking to become a class representative in this case. I believe my experiences
12 are similar to other hourly-paid, non-exempt employees of Defendant. I believe we were all subject
13 to the same employment policies and practices.

14 5. I do not have any conflicts with other hourly-paid, non-exempt employees that
15 would interfere with my ability to represent them. I believe I will adequately represent the other
16 hourly-paid, non-exempt employees at Defendant.

17 6. My interests as a named plaintiff in this case are not adverse to the interests of the
18 other hourly-paid, non-exempt employees. I believe my interests are the same as the other
19 employees because we were all subject to the same policies and practices and were similarly
20 injured by Defendant’s company-wide policies and practices. I am seeking the same recovery on
21 behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest
22 that are owed to us by Defendant.

23 7. I have always kept the best interests of the other hourly-paid, non-exempt employees
24 in mind while performing my duties as the named plaintiff in this case. I have been committed
25 throughout the course of this case to vigorously prosecuting this case on behalf of myself and the
26 other employees. I believe that I have demonstrated my ability to advocate for the interests of the
27 other hourly-paid, non-exempt employees by initiating this lawsuit, providing documents and
28

1 information to my attorneys, keeping in regular contact with my attorneys regarding the status of
2 the case, and reviewing the settlement agreement to make sure it was fair.

3 8. I will continue to actively participate in this lawsuit as necessary, and will continue
4 to make myself available to assist in this case moving forward as needed.

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

7 Executed on September 15, 2025 at Fresno, California.

Signed by:

8 

9 69244E84B43F42F...

10 Daniel Enriquez-Ulloa