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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SACRAMENTO

Coordination Proceeding Special Title (Rule 3.550) **PRIDE INDUSTRIES WAGE AND HOUR CASES**	JCCP No. 5410 [Assigned for all purposes to the Hon. Jill H. Talley, Dept 8A] **DECLARATION OF CURTIS WOOTEN IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** **Reservation No.:** A-05410-001 Date: December 4, 2026 Time: 9:00 A.M Dept.: 8A

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DECLARATION OF CURTIS WOOTEN

I, Curtis Wooten, declare as follows:

1. I am an individual over the age of 18. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I am one of the named plaintiffs in the above-reference action. I was employed by Defendant Pride Industries ("Defendant" or the "Company") as a Custodian at the Sacramento International Airport beginning on or about March 23, 2023. I worked as an hourly, non-exempt employee.

3. During my employment, I earned overtime wages and non-discretionary incentive pay, including shift differential pay. When I earned overtime pay and non-discretionary incentive pay during the same workweek, the Company did not include the additional incentive pay in the calculation of the regular rate of pay used to determine my overtime rate. As a result, I believe that I am owed additional overtime pay based on the correct, higher regular rate of pay.

4. Similarly, during my final week of employment my final wages, including vacation wages, did not include non-discretionary incentive pay in the calculation of the regular rate of pay. As such, I believe that I am owed additional wages.

5. As a result of the underpayment of wages, the corresponding wage statements I received did not identify accurate rates of pay and gross and net wages earned. Moreover, whenever shift differentials were paid, the wage statements I received did not identify the correct total hours worked.

6. I understand that this action was brought on behalf of current and former non-exempt employees of the Company who performed work in the State of California. As one of the proposed class representatives, I understand that it is my duty to represent the best interests of the class, know about the lawsuit, help my attorneys, and keep updated on the case.

7. I have invested a lot of personal time and energy while this lawsuit has been pending. I had multiple meetings and phone calls with my attorneys regarding my experience working at the Company, the Company's policies, and developments with the case. I also spent time looking for documents, such as employee handbooks, schedules, and wage statements, as

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well as reviewing the settlement documentation and other paperwork regarding my case.

8. As a class representative, I understand that it is my responsibility to act in the best interests of the Class and not my own. I am not aware of any conflicts that exist between my interests and the interests of the Class that would impair or affect my ability to serve as a representative for the Class.

9. I have and continue to be willing to assist in the investigation of this matter, including meeting and discussing the case with my attorneys, providing any necessary information and documents, making myself available for trial or any further proceedings in this matter as required to represent the interests of the Class. I also understand my duties and responsibilities to the proposed Class and will carry out those duties as necessary.

10. I have reviewed the Joint Stipulation of Class Action Settlement and Release ("Settlement Agreement") and discussed its terms with my attorneys, and based on the information provided, I believe the settlement to be fair, adequate, and reasonable for myself and for the entire Class.

11. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive accomplishment and understand that other people will benefit because of the actions that I have taken. I believe that the settlement is fair, adequate, and reasonable.

12. I respectfully request that the Court award a $10,000 enhancement payment to me. I believe this amount is fair compensation for my time and effort on this case, for helping to prosecute this case, and the risks with respect to my future employment. In addition, the Settlement Agreement requires that I enter into a general release, which I understand is broader than the release that will bind other Class Members.

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

Executed on this 3rd day of November 2026, at Sacramento, California.

Signed by:

C Wooten

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Curtis Wooten