Carolyn H. Cottrell (SBN 166977)
Esther L. Bylsma (SBN 264208)
Sandra Acosta Tello (SBN 315616)
SCHNEIDER WALLACE
COTTRELL KIM LLP
2000 Powell Street, Suite 1400
Emeryville, California 94608
Telephone: (415) 421-7100
Facsimile: (415) 421-7105
ccottrell@schneiderwallace.com
ebylsma@schneiderwallace.com
sacostatello@schneiderwallace.com

Attorneys for Plaintiff and the Putative Class

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SACRAMENTO

Coordination Proceeding Special Title (Rule 3.550)	JCCP No. 5410 [Assigned for all purposes to the Hon. Jill H. Talley, Dept 8A]
PRIDE INDUSTRIES WAGE AND HOUR CASES	**DECLARATION OF PLAINTIFF MICHAEL ALLEN IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT**
Coordinated actions: Sturgeon v. Pride Industries	Reservation No.: A-05410-001 Hearing Date: December 4, 2026 Hearing Time: 9:00 a.m. Dept. No.: 8A
Wooten v. Pride Industries	SUPERIOR COURT OF CALIFORNIA COUNTY OF PLACER NO. S-CV-0051712
Allen v. Pride Industries	SUPERIOR COURT OF CALIFORNIA COUNTY OF SACRAMENTO NO. 23CV001854
	SUPERIOR COURT OF CALIFORNIA COUNTY OF SACRAMENTO NO. 24CV004368

Doc ID: afb27f96e7efdd889ba08038968d70a32cee87af

DECLARATION OF MICHAEL ALLEN

I, Michael Allen, hereby declare as follows:

1. I am a named plaintiff and representative of the putative Class in the above-captioned matter ("Action") against Defendant Pride Industries. ("Defendant" or "Pride Industries"). I am over the age of 18. The following statements are based on my personal knowledge. If called upon to testify as to the matters stated herein, I could and would do so competently.

2. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class and PAGA Action Settlement ("Motion").

3. I have been employed by Defendant as a Job Coach since August 2019. I have experienced issues in my employment with Defendant, including Defendant failing to provide full, uninterrupted meal and rest breaks, failing to provide accurate itemized wage statements, and Defendant failing to reimburse me for work-related expenses.

4. Schneider Wallace Cottrell Kim LLP ("SWCK") is representing me in this case.

5. I knew there was no guarantee we would succeed in this case and that there was a significant likelihood of protracted litigation. I realized that my name would be associated with a class action, and that this information could be visible to others. I also understood that I may spend a significant amount of time in the discovery process.

6. I have provided significant assistance to my counsel in this case. For approximately the past two years since I officially joined the Action, I communicated frequently with my attorneys. In order for me to provide factual background for the Amended Complaint, it was necessary for me to recall and memorialize events from my former employment with Defendant, participate in multiple intake interviews, produce documents and be available for follow up calls, emails and text messages from my attorneys. I spent time speaking with my attorneys about the cases, identifying potential witnesses, providing my attorneys with documents and information concerning the cases, and describing policies, practices, and procedures of Defendant and was available throughout the first mediation session on December 9, 2024.

7. I have made myself readily available and have had multiple telephonic discussions with counsel regarding my work experience and possible claims to ensure that counsel had all the

Doc ID: afb27f96e7efdd889ba08038968d70a32cee87af

necessary information to make proper recommendations at final mediation session on February 13, 2026. I also produced all the documents in my possession to help assist my counsel in this matter. It took me several hours over the span of a couple of days to locate all the paystubs and other documents requested by my attorneys.

8. I worked with my attorneys and remained apprised of the case since choosing to become named plaintiff. I agreed to serve as named plaintiff in this matter out of a sincere desire to vindicate my and my co-workers' rights. By publicly lending my name to this Action, I subjected myself to considerable risk.

9. To make the Settlement a reality, I agreed to a general release which encompasses all claims I may have arising out of my employment with Defendant. In contrast, I understand the Class Members' release is limited to the claims alleged or that could have been alleged in this case.

10. Aside from payment I am eligible to receive as a Class Member and the service award of $10,000.00 for serving as named plaintiff (subject to Court approval), I am not receiving any other benefits from the Settlement. I do not have any interests adverse to the class.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 2 day of November 2026, at Sacramento CA, California.

M. Allen

MICHAEL ALLEN

Doc ID: afb27f96e7efdd889ba08038968d70a32cee87af