Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Yasmin Hosseini (SBN 326399)
Helene Mayer (SBN 332975)
LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs Edward Joseph Sturgeon and Darrin Cochran

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

Included Actions:
Edward Joseph Sturgeon, et al. v. Pride Industries, Superior Court of California, Placer County, Case No. S-CV-0051712

and

Edward Joseph Sturgeon v. Pride Industries, Superior Court of California, Placer County, Case No. S-CV-0051713

Curtis Wooten v. Pride Industries, Superior Court of California, Sacramento County Case No. 23-CV-001854

and

Michael Allen v. Pride Industries, Superior Court of California, Sacramento County, Case No. 24-CV-004368

Case No. JCCP5410

Honorable Jill Talley
Department 8A

CLASS ACTION

DECLARATION OF EDWARD JOSEPH STURGEON IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Reservation ID:	A-05410-001
Hearing Date:	December 4, 2026
Hearing Time:	9:00 a.m.
Department:	8A

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

DECLARATION OF EDWARD JOSEPH STURGEON

I, Edward Joseph Sturgeon, hereby declare as follows:

1. I am over 18 years of age and a resident of Oregon. I am one of the named plaintiffs in the above-captioned coordinated action. On November 20, 2023, I filed class action complaint, commencing the case entitled *Sturgeon v. Pride Industries*, Placer County Superior Court Case No. SV-CV-005173 ("*Sturgeon*"). On November 20, 2023, I filed a related representative action complaint, commencing the case entitled *Sturgeon, et al. v. Pride Industries*, Case No. S-CV-0051712) ("*Sturgeon PAGA*"). On May 2, 2024, the court consolidated the *Sturgeon* and the *Sturgeon PAGA* matters. On September 18, 2024, I filed a First Amended Consolidated Class Action Complaint for Damages and Enforcement Under the PAGA, adding Plaintiff Darrin Cochran as a named plaintiff and a Private Attorneys General Act ("PAGA") representative in the consolidated action. On November 5, 2025, the Court coordinated *Sturgeon*/*Sturgeon PAGA* action with the cases entitled *Wooten v. Pride Industries*, Sacramento County Superior Court Case No. 23-CV-001854, and *Allen v. Pride Industries*, Sacramento County Superior Court Case No. 24-CV-004368, under Case No. JCCP5410 in the Superior Court of California for the County of Sacramento. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

1. I was employed by Pride Industries ("Defendant") from approximately September 2021 to approximately June 2023 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for not properly compensating its employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC discussing my situation, complex wage-and-hour class actions and representative actions under PAGA in general, and what it meant to be a named plaintiff and class representative. Prior to commencing the cases, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what

my duties and responsibilities would be in that event.

2. Throughout the cases, I have spent time speaking with my attorneys regarding the cases and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

3. Throughout this matter, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. 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.

4. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I reviewed the Memorandum of Agreement and the Settlement Agreement and discussed the questions I had regarding the potential settlement with my attorneys before signing the settlement papers.

5. I understand that a settlement has been reached in my case and what my duties and responsibilities are as a class representative. For example, I am aware that if the settlement is granted preliminary approval, the Court will certify a class for settlement purposes and likely appoint me as one of the representatives of the class and my attorneys as counsel for the class. I also understand that my duties will include checking in on, monitoring, and conferring with my attorneys to facilitate the notice and settlement administration process, and to provide information that the Court needs in order to assess whether the settlement is fair, reasonable, and adequate. Further, if any individuals who are potential class members contact me, I will take steps to have them referred to the Court-appointed settlement administrator so that these individuals may receive the necessary information and notice they may be eligible to receive in connection with the

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

settlement and contemplated final approval hearing.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class and pursue relief on behalf of other class members. I have volunteered to represent and champion the interests of many other people with similar claims and injuries because of the importance of the cases and the necessity that all class members and aggrieved employees benefit from the lawsuits equally. I understand that as a proposed class representative, and if formally appointed as a class representative, I have and continue to represent the interests of all members of the class in litigation to recover relief for the class. As an hourly-paid non-exempt employee of Defendant who was subject to the same policies, practices, and procedures as the other members of the class, I have claims that are typical of those of the class. I consider the interests of the class just as I would consider my own interests. I understand that I may need to put the interests of the class before my own interests, although I have no reason to believe that my interests are in conflict with the interests of the class. I understand that any resolution of the lawsuit is subject to court approval and must be in the best interest of the class as a whole. I have participated, and continue to participate, in the lawsuit as necessary. I have actively followed and monitored the progress of the lawsuits and have taken steps to make sure that the litigation is prosecuted by the skilled and effective attorneys that I have retained.

7. I think my efforts helped to get the result obtained in these matters, and as a potential class representative, I respectfully request that the Court award me a class representative service payment for my efforts in pursuing and participating in these matters, as well as my broader release of claims. Taking into consideration the time that I have dedicated to these matters, I believe that this amount is reasonable.

8. I am not related to anyone associated with Lawyers *for* Justice, PC, Diversity Law Group, P.C., Polaris Law Group, or Schneider Wallace Cotrell Kim LLP.

9. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in these matters. The only compensation I will receive is whatever amount the Court awards as a class representative service payment, as well as my share of the

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

settlement as a class member.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. 11/06/2026

Executed on this ___day of _____ 2026, at Myrtle Creek, Oregon.



Edward Joseph Sturgeon

LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203