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MICHAEL TAYLOR CONSTRUCTION, LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF MADERA

CHRISTIAN GOMEZ, individually and on behalf of all similarly situated individuals, Plaintiff, v. MICHAEL TAYLOR CONSTRUCTION, LLC, a California Limited Liability Company; and Does 1-10; inclusive, Defendants.	Case No. MCV100436 **CLASS ACTION** **DECLARATION OF DEFENDANT ASH KNOWLTON IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** Action Filed: December 12, 2025 Trial Date: None Set

I, Ash Knowlton, declare as follows.

1. I am the President of Construction for Michael Taylor Construction, LLC, Defendant in this action. I have personal knowledge of the matters set forth herein and, if called upon to testify, could and would competently testify thereto.

2. Defendant operates in the construction industry, building almost exclusively for the Tesoro Viejo development in the Madera Ranchos area of the Central Valley, and its business has been directly impacted by declining conditions in the residential housing market.

3. Over the past several years, Defendant has experienced significant financial challenges resulting from the downturn in the housing market. Reduced demand and unfavorable

market conditions have negatively impacted Defendant's revenues and overall financial performance.

4. During this period, Defendant has operated on extremely narrow margins, with revenues barely sufficient to cover its ordinary and necessary operating expenses. As a result, Defendant has had limited available cashflow and financial resources to satisfy obligations beyond its ongoing operating costs.

5. These financial challenges have substantially limited Defendant's ability to fund a significant settlement payment, particularly a lump-sum payment, without jeopardizing its ability to meet ongoing operating expenses and maintain business operations. Defendant has had to lay off its fencing and maintenance divisions.

6. In light of Defendant's financial circumstances, a structured payment plan was necessary to facilitate resolution of this litigation. The installment payment arrangement incorporated into the proposed settlement allows Defendant to satisfy its settlement obligations over time while continuing to meet its ordinary business expenses.

7. Without the negotiated payment arrangement, Defendant will face substantial financial difficulty funding the settlement, which would have prevented the parties from reaching a resolution.

8. Defendant enters into the proposed settlement in good faith and intends to comply with all payment obligations in accordance with the terms of the Settlement Agreement. Should the Court require additional information from Defendants, Defendants are willing to provide such information confidentially for the Court's review.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct. Executed this 28 day of October 2026, at Fresno, California.

By: _____
Ash Knowlton

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