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Attorney for Plaintiff Christian Gomez
and the Settlement Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MADERA

Christian Gomez, individually and on behalf of all similarly situated individuals,

Plaintiff,

vs.

Michael Taylor Construction, LLC, a California Limited Liability Company; and **Does 1-10**, inclusive;

Defendants.

CASE NO. MCV100436

[Assigned for all purposes to the Hon. Michael Jurkovich, Dept. 44]

CLASS ACTION

DECLARATION OF CHRISTIAN GOMEZ IN SUPPORT OF MOTION FOR:

(1) PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT;

(2) APPROVAL OF NOTICE TO CLASS MEMBERS AND RELATED MATERIALS; AND

(3) SETTING HEARING FOR FINAL APPROVAL OF SETTLEMENT

DECLARATION OF CHRISTIAN GOMEZ

I, Christian Gomez, declare as follows:

1. The facts set forth herein are true of my own personal knowledge, and if called upon to testify thereto, I could and would competently do so under oath.

2. I am the Named Plaintiff in this action. On December 12, 2025, the Class Action Complaint entitled *Christian Gomez v. Michael Taylor Construction, LLC*, Case No. 25CECG05735, was filed in Fresno County Superior Court. The Action was subsequently transferred to Madera County Superior Court and assigned Case No. MCV100436 (the "Action"). The Action was brought on my behalf and on behalf of all persons who worked at least one shift as a non-exempt employee for Defendant in the State of California from the period four years prior to the filing of the Action through the date of trial (the "Class").

3. I am a resident of the county of Fresno in the State of California and was an hourly, non-exempt employee of Michael Taylor Construction, LLC ("Defendant") from on or around April 18, 2025 to on or around October 17, 2025.

4. My experience working for Defendants as a Maintenance Technician was substantially similar to that of my fellow Class Members, and we were all subject to the same policies, practices, and procedures.

5. I hired Barahmand Law Group in order to obtain justice for myself and the entire Class for these illegal labor practices.

6. I understand that, as a Class Representative, I have a duty to look out for and protect the interests of the Class as a whole. I do not believe, nor do I have any reason to believe, that my interests in this lawsuit are in conflict or is in any way antagonistic to the interests of those of my fellow Class Members.

7. Given the various defenses asserted by Defendant, the risk of losing class certification or losing claims on the merits, the risk of not being awarded penalties, the delay of any potential appeals, and the fact that Class Members have a need for payment sooner rather than later, I believe, along with my counsel, that the Settlement obtained is fair and reasonable to the members of the Class.

8. As the Named Plaintiff in this action, I provided valuable assistance to Class Counsel and the Class in this case, including providing factual background for mediation and the Class Complaint; reviewing relevant documents, the Complaint, and this declaration; participating in phone calls meetings with Class Counsel to discuss litigation and settlement strategy; participating in mediation preparation; reviewing the settlement documents, and preparing this Declaration, among others. I agreed to participate in this case with no guarantee of personal benefit.

9. This case also involved risks to me personally, such as the potential risk of having to pay costs if we lost and the risk of negative publicity by or to anyone who opposed this case. This litigation was also lengthy. I have been involved in this case—seeking to obtain a benefit for the Class—for almost one (1) year all with no assurance that I would recover any personal benefit.

10. Outside of the requested incentive award and my share of the class recovery, I have received no personal benefit for my work and I am not receiving any consideration for my participation in this Settlement other than my requested service award and pro rata share of the Settlement.

11. Even in the face of these risks, I pursued this case on behalf of the Class because I believe in it, and we reached a successful resolution and settlement.

12. I was happy to learn that the case settled on behalf of the Settlement Members for the amount of $300,000.00. I believe this is a very positive result, and glad that my efforts helped other employees to benefit and obtain vindication for the Labor Code violations they suffered.

13. I understand that class representatives are eligible for compensation for their efforts as a named plaintiff in an action. I respectfully request that the Court preliminarily grant an award to me in the amount of $10,000, in addition to my pro rata share of the Settlement fund.

14. Based on the strong result obtained for the Class, I, along with my counsel, believe this is a fair and appropriate award. I am prepared, and will provide, a detailed accounting of my hours spent assisting in the litigation as part of the Motion for Final Approval.

15. I respectfully ask that the Court grant final approval of this Settlement and grant my request for a service award.

16. I am not currently, nor have I ever been, a Named Plaintiff in any other PAGA

Representative case, pending or closed.

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

Executed on 10/14/2026 in the county of Madera, California.

By: Christian Gomez (Oct 14, 2026 13:06:56 PDT)
Christian Gomez