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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

EDGAR JESUS LARA and MARK SEXTON,
individually, and on behalf of all others similarly
situated,

Plaintiffs,

v.

EMERALD SITE SERVICES, INC., a California
corporation; and DOES 1 through 10, inclusive,

Defendants.

EDGAR JESUS LARA and MARK SEXTON,
individually, and on behalf of the State of
California and other aggrieved persons,

Plaintiffs,

v.

EMERALD SITE SERVICES, INC., a California
corporation; and DOES 1 through 10, inclusive,

Defendants.

ELECTRONICALLY FILED
Superior Court of California
County of Sacramento

07/31/2025

By: A. Gray Deputy

Lead Case No.: 34-2022-00332284
Consolidated Case No.: 23CV005919

*Assigned for all purposes to:
Hon. Jill H. Talley
Dept. 23*

**DECLARATION OF EDGAR JESUS
LARA IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: August 22, 2025
Time: 9:00 a.m.
Dept.: 23

1 I, Edgar Jesus Lara, hereby declare as follows:

2 1. I have personal knowledge of the facts set forth herein and if called upon to testify, I
3 could and would do so competently under oath. I make this declaration in support of my Motion for
4 Preliminary Approval of Class Action and PAGA Settlement.

5 2. I worked for Defendant Emerald Site Services, Inc. ("Defendant") as an hourly-paid,
6 non-exempt laborer from around May 2020 to September 2022.

7 3. Based on my experience and knowledge of Defendant's wage and hour policies and
8 my familiarity with its employment practices, I worked with my attorneys to bring claims on my own
9 behalf as well as on behalf of other hourly-paid, non-exempt employees of Defendant.

10 4. I am seeking to become a class representative in this case. I believe my experiences
11 are similar to other hourly-paid, non-exempt employees of Defendant. I believe we were all subject
12 to the same employment policies and practices.

13 5. I do not have any conflicts with other hourly-paid, non-exempt employees that
14 would interfere with my ability to represent them. I believe I will adequately represent the other
15 hourly-paid, non-exempt employees of Defendant.

16 6. My interests as a named plaintiff in this case are not adverse to the interests of
17 the other hourly-paid, non-exempt employees. I believe my interests are the same as the other
18 employees because we were all subject to the same policies and practices and were similarly
19 injured by Defendant's company-wide policies and practices. I am seeking the same recovery on
20 behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest
21 that are owed to us by Defendant.

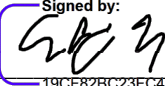
22 7. I have always kept the best interests of the other hourly-paid, non-exempt employees
23 in mind while performing my duties as one of the named plaintiffs in this case. I have been
24 committed throughout the course of this case to vigorously prosecuting this case on behalf of
25 myself and the other employees. I believe that I have demonstrated my ability to advocate for the
26 interests of the other hourly-paid, non-exempt employees by initiating this lawsuit, providing
27 documents and information to my attorneys, keeping in regular contact with my attorneys
28

1 regarding the status of the case, making myself available during mediation, and reviewing the
2 settlement agreement to make sure it was fair.

3 8. I will continue to actively participate in this lawsuit as necessary and will continue to
4 make myself available to assist in this case moving forward as needed.

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

7 Executed on 7/31/2025, at Sacramento, California.

8 Signed by:
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11 Edgar Jesus Lara
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