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

ERIC SCHNEEKLUTH, individually, and on
behalf of other members of the general public
similarly situated; MIGUEL GUZMAN,
GABRIEL CASTELLANOS-LOPEZ,
individually, and on behalf of other members
of the general public similarly situated and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act

Plaintiffs,

vs.

MOUNTAIN F. ENTERPRISES, INC, a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 25CV015840

Honorable Lauri A. Damrell
Department 8B

CLASS ACTION

**DECLARATION OF ERIC
SCHNEEKLUTH IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Reservation ID: A-15840-001
Hearing Date: August 14, 2026
Hearing Time: 9:00 a.m.
Department: 8B

Complaint Filed: July 1, 2025
FAC Filed: April 8, 2026
SAC Filed: May 21, 2026
Trial Date: None Set

DECLARATION OF ERIC SCHNEEKLUTH

I, Eric Schneekluth, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am a named plaintiff in the above-captioned case. 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.

2. I was employed by Mountain F. Enterprises, Inc. ("Defendant") from approximately September 2022 to approximately March 2024 as an hourly-paid 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 in general, and what it meant to be a named plaintiff, class representative. Prior to commencing the case, 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.

3. Throughout the case, I have spent time speaking with my attorneys regarding the case 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 or 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.

4. 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 case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing

1 policies, practices, and procedures of Defendant.

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

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

17 7. I believe that I have done everything that my attorneys have asked of me and have
18 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class
19 members. I have volunteered to represent and champion the interests of many other people with
20 similar claims and injuries because of the importance of the case and the necessity that all class
21 members benefit from the lawsuit equally. I understand that as a proposed class representative, and
22 if formally appointed as a class representative, I have and continue to represent the interests of all
23 members of the class in litigation to recover relief for the class. As an hourly-paid employee of
24 Defendant who was subject to the same policies, practices, and procedures as the other members of
25 the class, I have claims that are typical of those of the class. I consider the interests of the class just
26 as I would consider my own interests. I understand that I may need to put the interests of the class
27 before my own interests, although I have no reason to believe that my interests are in conflict with
28 the interests of the class. I understand that any resolution of the lawsuit is subject to court approval

1 and must be in the best interest of the class as a whole. I have participated, and continue to
2 participate, in the lawsuit as necessary. I have actively followed and monitored the progress of the
3 lawsuit, and have taken steps to make sure that the litigation is prosecuted by the skilled and
4 effective attorneys that I have retained.

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

9 9. I am not related to anyone associated with Lawyers *for* Justice, PC.

10 10. I have not entered into any undisclosed agreements, nor have I received any
11 undisclosed compensation in this matter. The only compensation I will receive is whatever amount
12 the Court awards as an enhancement award, as well as my share of the settlement as a class
13 member.

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

05/08/2026

16 Executed on this ____ day of May 2026, at Seaside, California.

17 
18 Electronically Signed: 2026-05-08 00:59:28 UTC - 146.75.154.82
Nintex AssureSign® c7b7326-8125-429f-846c-b444017ec3a9

Eric Schneekluth