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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SHASTA

JACOB MCCULLOUGH, JOAQUIN
MORALES, 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.

WRIGHT TREE SERVICE, INC., an Iowa
corporation; WRIGHT TREE SERVICE OF
THE WEST, INC., an Iowa corporation; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 23CV-0203309

Honorable Stephen H. Baker
Department 64

CLASS ACTION

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

Date: September 15, 2025
Time: 8:30 a.m.
Department: 64

Complaint Filed: September 26, 2023
Trial Date: None Set

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1 4. Throughout this matter, I was available to answer any questions my attorneys had,
2 and available to speak and meet with my attorneys whenever they needed me. I responded to
3 them as quickly as possible and gave them as much information and identified as many
4 documents as I could. I spent time speaking with my attorneys about the cases, identifying
5 potential witnesses, providing my attorneys with documents and information concerning the
6 cases, and also describing policies, practices, and procedures of Defendants.

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

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

16 7. I am not related to anyone associated with Lawyers *for* Justice, PC or Haines Law
17 Group, APC.

18 8. I have not entered into any undisclosed agreements, nor have I received any
19 undisclosed compensation in this matter. The only compensation I will receive is whatever
20 amount the Court awards as an enhancement payment, as well as my share of the settlement as a
21 class member and aggrieved employee.

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct. 04/23/2025

24 Executed this ____ day of April 2025, at Anderson, California.

25 
26 Electronically Signed 2025-04-24 00:48:38 UTC - 47:45:59.115
Nintex AssureSign® 7954d1cf-6e56-4ac8-bf07-b2c900029874

27 Jacob McCullough
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