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Attorneys for Plaintiff and the proposed class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

OSCAR IRUEGAS an individual, on behalf
of himself and others similarly situated

PLAINTIFF,

v.

BALD EAGLE SECURITY SERVICES,
INC.; and DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. 37-2023-00030158-CU-OE-CTL

[Case Assigned for All Purposes to Hon. Blaine
K. Bowman in Dept. C-74]

**DECLARATION OF OSCAR IRUEGAS IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: November 1, 2024

Time: 8:30 A.M.

Dept.: C-74

Complaint Filed: July 18, 2023

FAC Filed: September 25, 2023

Trial Date: None Set

DECLARATION OF OSCAR IRUEGAS

I, Oscar Iruegas, state and declare as follows:

1. I am a competent adult, over the age of eighteen and the Class Representative Plaintiffs in the matter of OSCAR IRUEGAS, an individual, on behalf of himself and others similarly situated v. Bald Eagle Security Services, Inc.; and DOES 1 thru 50, inclusive, San Diego County Superior Court, Case No. 37-2023-00030158-CU-OE-CTL. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto. I am making this sworn declaration in support of my claims and the claim of my co-workers, and in support of my qualifications as Class Representative. If called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I worked as a security officer for Bald Eagle Security Services, Inc. (“Defendant” or “Bald Eagle”).

3. In my role as a security officer, I regularly did not receive thirty (30) minute uninterrupted meal periods within the first five (5) hours of my shift when working five hours or more. I also regularly was not provided with ten-minute paid rest periods for every major fraction of four hours that I worked. In addition, I did not receive reimbursement for business related use of my personal cell phone. Lastly, I did not receive timely wages at the time of termination or separation.

4. I have spent significant time throughout this class action working with Class Counsel. Before filing this action, in July 18, 2023, I researched and identified Counsel that I believed could best represent the interests of the Class Members. I also assisted the attorneys with investigation and gathering of information including discussing my work experience and the experience of others that I had observed while working for Bald Eagle and provided all relevant employment documents in my possession. In addition, I attended a full-day mediation on April 23, 2024. While at the Mediation, I actively participated in the discussions with the Class Counsel and shared my knowledge and insights in order to help the Class obtain a favorable settlement.

5. Moreover, I have agreed to serve as Class Representative and have retained qualified Counsel who is experienced in prosecuting wage and hour class actions. This

demonstrates my commitment to bringing about the best possible results for the benefit of the proposed settlement Class.

6. Throughout the entirety of this litigation, I have maintained regular contact with Class Counsel and assisted in any way possible by providing information and making myself available as needed.

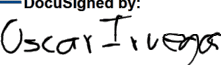
7. I was aware that by helping to initiate this lawsuit, my name would become known and it was possible that my involvement in this matter could make it more difficult for me to obtain employment in this field. Regardless, I believed it was important to proceed with this matter on my behalf and on behalf of all others who were subject to the same problems during their employment with Bald Eagle.

8. Based upon my participation in this case, I understand the merits of this settlement and I strongly support the settlement and believe it is fair and reasonable, and in the best interest of the class. I believe this Settlement will benefit the Class.

9. I believe my interests in this litigation are coextensive with the interests of the proposed Class Members. The members of the proposed settlement Class all worked for Defendant during the relevant time period and incurred the same type of alleged damages with regard to Defendant's alleged violations of the law.

10. It is my opinion that a fair and adequate Class enhancement for me as a Class Representative is \$5,000.00. I believe that it is fair and reasonable in view of all of the work I have performed in my role as a Class Representative. As Class Representative, I actively participated in all stages of the litigation as detailed above and have always maintained the best interest of the Class while performing my Class Representative duties.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 16 day of July, 2024 at San Diego, California.

DocuSigned by:

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Oscar Iruegas
Declarant

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(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On July 23, 2024, I served all interested parties in this action the following documents described as: **DECLARATION OF OSCAR IRUEGAS IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

FERRIS & BRITTON A Professional Corporation Elyssa K. Kulas Scott H. Toothacre Michael R. Weinstein Debra L. Barker 501 West Broadway, Suite 1450 San Diego, California 92101 ekulas@ferrisbritton.com stoothacre@ferrisbritton.com mweinstein@ferrisbritton.com dbarker@ferrisbritton.com <i>Attorneys for Defendant</i>	ABRAMSON LABOR GROUP WILLIAM ZEV ABRAMSON Wza@abramsonlabor.com 11846 Ventura Blvd., Suite 100 Studio City, CA 91604 <i>Attorneys for Plaintiff</i>
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[XX] (BY ELECTRONIC SERVICE) I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION) I caused the document to be sent to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on July 23, 2024, at Woodland Hills, California.



Michelle Tanzer