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Attorneys for Sean Martinez, individually
and on behalf of others similarly situated

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

SEAN MARTINEZ, individually, and on behalf
of all others similarly situated,

Plaintiff,

vs.

MILLENNIUM FIRE PROTECTION
CORPORATION, a California corporation;
MILLENNIUM FIRE PROTECTION
SERVICES, INC., a California corporation; and
DOES 1 through 10, inclusive,

Defendants.

Case No.: 23CU0271

Assigned for all purposes to:
Hon. Jennifer Giuliani, Dept. 1

**DECLARATION OF PLAINTIFF SEAN
MARTINEZ IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Final Approval Motion Hearing
Date: May 6, 2026
Time: 8:15 a.m.
Dept.: 1

DECLARATION OF SEAN MARTINEZ

I, Sean Martinez, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness. I submit this declaration in support of my Motion for Final Approval of Class Action and PAGA Settlement.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

2. When I agreed to participate in this action as a class representative on behalf of other employees of Millennium Fire Protection Corporation and Millennium Fire Protection Services, Inc. ("Defendants"), and as a private attorney general for the State of California, I understood that I was pursuing relief not only for myself, but also for other individuals who worked for Defendants. I further understood that, by proceeding in this manner, I was foregoing the possibility of obtaining a more immediate recovery through the Labor Commissioner's office.

3. I understood that serving as a class representative and private attorney general on behalf of others could subject me to a stigma sometimes associated with individuals who bring these types of claims. I was also aware that, in that role, I could potentially be held responsible for some or all of Defendants' legal costs if the case was not successfully resolved. Despite these risks, I chose to proceed and represent the interests of other employees and the State of California, although I had concerns about the possibility of an adverse judgment for costs and the impact this litigation might have on my future employment opportunities.

4. I recognized that pursuing a class and representative action involves inherent risks. I understood that the litigation could extend over several years and require my ongoing participation and attention throughout that time. I also understood that, even if successful at trial, the case could be subject to additional delays due to the appellate process.

Notoriety and Personal Difficulties Encountered

5. As a named plaintiff in this matter, I have taken on a public role in prosecuting this action. The class notice distributed in this case was mailed to 106 current and former employees of Defendants, advising them that I initiated a class and representative lawsuit against Defendants. By allowing my name to be associated with this litigation, I have exposed myself to potential

professional consequences, as individuals within the fire suppression and protection industry—including current or former employees of Defendants and their professional networks—may be less inclined to offer future employment opportunities to someone who has brought suit against their employer.

Amount of Time and Effort Spent and Duration of the Litigation

6. Participating in this lawsuit as a named class representative required me to spend a lot of my own time helping move the needle forward as it related to the prosecution of this matter. As detailed below, I have spent approximately 20 hours on this case.

7. Throughout this case, I had numerous phone conversations with my attorneys to stay updated on the case and share relevant information. For instance, during some of these calls, we identified specific instances where I had not been paid correctly. Additionally, in preparation for mediation, I engaged in several lengthy discussions with Wilshire Law Firm about the claims involved and the mediation process.

8. During the course of the case, I devoted significant time to locating and providing relevant documents to my attorneys. This process required numerous hours, including when I initially contacted my attorneys, prior to the case being filed, and in the lead-up to mediation. I also reviewed legal documents, such as the retainer and settlement agreement, and engaged in detailed discussions with my attorneys about their terms.

Personal Benefit Received as a Result of the Litigation

9. I understand that under this settlement agreement, I may receive a service payment of up to \$10,000.00. I believe this sum fairly compensates me for the time and effort I committed to prosecuting this case, as well as the potential impact on my future employment.

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

Executed on 4/15/2026, at Fresno, California.

Sean Martinez

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Sean Martinez

PROOF OF SERVICE

Sean Martinez v. Millennium Fire Protection Corporation, et al.
23CU0271

I, Theresa Chan, state that I am employed in Los Angeles County, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 660 S. Figueroa St., Sky Lobby, Los Angeles, California 90017. My electronic service address is theresa.chan@wilshirelawfirm.com.

On April 15, 2026, I served the foregoing:

**DECLARATION OF PLAINTIFF SEAN MARTINEZ IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**

on the interested parties as follows:

Bryan L. Hawkins
bryan.hawkins@stoel.com
Robert Sarkisian
robert.sarkisian@stoel.com
STOEL RIVES LLP
500 Capitol Mall, Suite 1600
Sacramento, CA 95814

Attorneys for Defendants
MILLENNIUM FIRE PROTECTION
CORPORATION; and MILLENNIUM FIRE
PROTECTION SERVICES, INC.

(X) **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the person at the email addresses listed above using One Legal.

(X) **BY UPLOAD:** I hereby certify that the documents were uploaded by my office to the State of California Labor & Workforce Development Agency Online Filing Site.

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

Executed on April 15, 2026, at Los Angeles, California.



Theresa Chan