

BIBIYAN LAW GROUP, P.C.
David D. Bibiyan (Cal. Bar No. 287811)
david@tomorrowlaw.com
Vedang J. Patel (Cal. Bar. No. 328647)
vedang@tomorrowlaw.com
1460 Westwood Boulevard
Los Angeles, CA 90017
Telephone: (310) 438-5555
Facsimile: (310) 300-1705

Attorneys for Plaintiffs, on behalf of themselves and all other aggrieved employees
[Additional Counsel for Plaintiffs listed on next page]

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

CHRISTIAN MATTHEW MARTINEZ,
JOEL SUAREZ, and HUGO GAMEZ, as
aggrieved employees and on behalf of all other
aggrieved employees under the Labor Code
Private Attorney's General Act of 2004,

Plaintiffs,

v.

BUILDER SERVICES GROUP, INC.,dba
TRUTEAM OF CALIFORNIA, a Florida
Corporation; and DOES 1 through 100,
inclusive,

Defendants.

CASE NO.: CVRI2305906

**DECLARATION OF MICHAEL BUI ON
BEHALF OF SIMPLURIS RE:
QUALIFICATIONS AND COSTS FOR
SETTLEMENT ADMINISTRATION**

1 Brian J. Mankin, Esq. [CSB No. 216228]
2 *brian@lmlfirm.com*
3 Peter J. Carlson, Esq. [CSB No. 243009]
4 *peter@lmlfirm.com*
5 LAUBY, MANKIN & LAUBY LLP
6 5198 Arlington Avenue, PMB 513
7 Riverside, CA 92504
8 Tel: (951) 320-1444 | Fax: (951) 320-1445
9
10 LOUIS M. BENOWITZ (SBN 262300)
11 *louis@benowitzlaw.com*
12 BENOWITZ LAW CORPORATION
13 8605 Santa Monica Boulevard
14 PMB 97638
15 West Hollywood, CA 90069
16 Telephone: (747) 233-2600 Work
17 Facsimile: (818) 839-9610
18
19 DAVID GLENN SPIVAK (SBN 179684)
20 *david@spivaklaw.com*
21 CAROLINE TAHMASSIAN (SBN 285680)
22 *caroline@spivaklaw.com*
23 THE SPIVAK LAW FIRM
24 8605 Santa Monica Bl
25 PMB 42554
26 West Hollywood, CA 90069
27 Telephone: (213) 725-9094
28 Facsimile: (213) 634-2485

Attorneys for Plaintiffs, on behalf of themselves and all other aggrieved employees

1 I, Michael Bui, declare as follows:

2 1. I am a Director of Client Services for Simpluris Inc. ("Simpluris"). I am over 18
3 years of age and authorized to make this declaration on behalf of Simpluris and myself, and make
4 this declaration based upon my own personal knowledge.

5 2. Simpluris has extensive experience in class action matters, having provided services
6 in class action settlements involving antitrust, securities fraud, property damage, employment
7 discrimination, employment wage and hour, product liability, insurance, and consumer issues.
8 Simpluris specializes in pre-settlement consultation, data management, legal notification, call center
9 support, claims processing, and tax reporting.

10 3. We have provided notification and/or claims administration services in more than
11 9,000 cases. Over the past eighteen (18) years, Simpluris has handled approximately \$8 billion in
12 settlements. A true and correct copy of Simpluris' company resume ("Simpluris Resume") is
13 attached as Exhibit A.

14 4. Simpluris is committed to the security of not only our data and information but the
15 Parties' data and information as well. We have not experienced any security breaches in our
16 company's history. A true and correct copy of our SOC 2 Certification demonstrating our
17 commitment to security is attached as Exhibit B. Additionally, Simpluris maintains insurance
18 coverage for \$3,000,000 for Errors and Omissions.

19 5. Simpluris does not have any affiliation with counsel for this matter.

20 6. Simpluris has been selected by counsel to serve as the Notice and PAGA Settlement
21 Administrator for this case. In this capacity, Simpluris will be charged with, among other
22 responsibilities: (a) providing the Notice of Settlement to the PAGA Employees in English and
23 Spanish; (b) calculating individual settlement payments, distributing funds, and tax-reporting
24 following final approval; (c) mailing settlement checks; and (d) answering questions from PAGA
25 Employees.

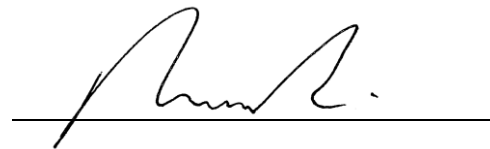
26 7. The mailing addresses contained in the Aggrieved PAGA Employee Data will be
27 processed and updated utilizing the National Change of Address Database ("NCOA") maintained
28 by the U.S. Postal Service. The NCOA contains requested changes of address filed with the U.S.

1 Postal Service. If any individual has filed a U.S. Postal Service change of address request, the
2 address listed with the NCOA will be utilized in connection with the mailing of the PAGA Letter
3 and Payment.

4 8. For any Notices that are returned to Simpluris as undeliverable, Simpluris will
5 perform address traces to find an updated address. The address trace will utilize the PAGA
6 Employee's name, previous address, and Social Security Number. In the event an updated address
7 is obtained, the Notice documents will be promptly re-mailed to those Members via First Class mail.
8 For Notice documents that are returned by the Post Office with a forwarding address attached, these
9 Notice documents will be promptly re-mailed to those Members at the forwarding address via First
10 Class mail.

11 9. Simpluris' costs to administer the case are \$9,556. However, Simpluris has offered
12 a courtesy client discount of \$5,556 and has agreed to administer the case for a fixed fee of \$4,000.
13 If the scope of work increases or decreases significantly, Simpluris will inform the parties and
14 request approval of an adjustment, whether it increases or decreases, respectively, based on the
15 population size of 1,578 individuals. A true and correct copy of Simpluris' bid for administering
16 this matter is attached as **Exhibit C**.

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18 I declare under penalty of perjury under the laws of the State of California that the above is
19 true and correct and that this Declaration was executed this 23rd day of October, 2025, in Costa
20 Mesa, California.

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