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8 Attorneys for Plaintiff
ALBERT RUDY GARCIA, individually, and
9 on behalf of all others similarly situated

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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE
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14 ALBERT RUDY GARCIA, an individual, on
15 behalf of himself and all others similarly
situated,

16 Plaintiff,

17 vs.

18 SKYLINE SOLAR, LLC, a Nevada limited
19 liability company; and DOES 1 through 50,
inclusive,

20 Defendants.
21
22

CASE NO.: 24STCV06118

[Assigned for all purposes to the Hon.
Theresa M. Traber, Dept. SSC-1]

**DECLARATION OF PLAINTIFF
ALBERT RUDY GARCIA**

Date: January 26, 2027
Time: 10:30 a.m.
Dept.: SSC-1

Action Filed: March 11, 2024
Trial Date: None set

DECLARATION OF ALBERT RUDY GARCIA

I, ALBERT RUDY GARCIA, declare as follows:

1. I am a named plaintiff in the above-captioned action entitled *Albert Rudy Garcia v. Skyline Solar, LLC, et al.*, Los Angeles County Superior Court Case No. 24STCV06118.

2. This declaration is based on my personal firsthand knowledge, unless another source of information or belief clearly appears from the context, and as to all such matters, I believe them to be true. If called as a witness, I could and would readily and competently testify to all matters stated in this declaration.

3. I was employed by Defendant Skyline Solar, LLC (“Defendant”) as an Installation Foreman from in or around April 2023 to in or around July 2023.

4. In or around July 2023, I retained Matern Law Group, PC (“MLG”) to represent me in my wage and hour claims against Defendant. Since that time, I have actively participated in this case by undergoing a lengthy intake process; maintaining regular contact with my counsel; searching for and providing my counsel with information and documents to support my claims; discussing my work experiences with my counsel; making myself available to my counsel, including for the full-day of the mediation; keeping myself apprised of developments in the Action; making decisions in the Action, including regarding settlement; asking my counsel questions; making sure I understood everything that was going in the Action so I could make the best informed decisions on behalf of the Class; and reviewing the Settlement documents and declaration in support of this motion. I estimate that I have spent approximately 15-20 hours on this case in total.

5. I seek to be appointed as a class representative in this case. I understand that a class representative: (a) represents the interests of all members of the class in litigation to recover money damages or obtain injunctive relief for the class; (b) has claims that are typical of those of the class, thus involving common issues of law or fact; (c) acts as a fiduciary to the class, always considering the interests of the class just as they would consider their own interests and, sometimes putting the interests of the class before their own interests; (d) actively participates in the lawsuit, as necessary; (e) may be required to travel to give such testimony; (f) recognizes and

1 accepts that any resolution of the lawsuit, by dismissal or settlement, is subject to court approval
2 and must be in the best interest of the class as a whole; (g) should follow the progress of the
3 lawsuit and provide all relevant facts to the lawyers for the class; and (h) volunteers to represent
4 or champion many other people with similar claims and damages because of the importance of
5 the case and the necessity that all class members benefit from the lawsuit equally.

6 6. I understand that the members of the proposed class are similarly situated with
7 respect to a common course of conduct, policy, or practice. I believe that, during my employment
8 with Defendant, I was subjected to the same uniform policies, procedures, and practices as other
9 members of the proposed class, such as policies regarding meal and rest periods and
10 reimbursement of employee expenses, among other policies.

11 7. I realized the risks I would be taking by pursuing this class action as a named
12 plaintiff and class representative. I knew that Defendant might retaliate against me for bringing
13 this lawsuit or that future employers might conduct a background check on me or otherwise find
14 out about my participation in the case and be unwilling to hire me as a result.

15 8. I also knew there was no guarantee about the outcome of the case, and that if
16 Defendant were to prevail, I could be liable for its litigation costs, in addition to being responsible
17 for paying my own litigation costs. Despite these risks, I felt so strongly about standing up for
18 the rights of my coworkers that I initiated and participated in this lawsuit.

19 9. As part of the Class Action and PAGA Settlement Agreement, I am releasing all of
20 my individual claims arising from my employment with Defendant during the Class Period. I am
21 also waiving my rights under Civil Code section 1542 as to any other claims against Defendant. I
22 understand that this release is a more comprehensive release than the release that applies to the
23 other class members.

24 10. I placed the interests of my co-workers and other non-exempt employees of
25 Defendant ahead of my own interests by postponing the prosecution of my individual wage and
26 hour claims and any recovery for myself alone so that the case could be litigated and resolved as a
27 class action, which benefitted the class as a whole and not just my interests.
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1 11. In agreeing to be a named Plaintiff in this case, I understand that in some
2 situations, I must put the interests of class members before my own interests. As a class
3 representative, I will always consider the interests of class members just as I would consider my
4 own interests, and I will continue to actively participate in the case, as necessary.

5 12. I have not entered into any undisclosed agreements, nor have I received any
6 undisclosed compensation in this case. The only compensation I will receive is whatever amount
7 the Court awards as a service award, as well as my Individual Class Payment and Individual
8 PAGA Payment.

9 13. I do not believe that I have any conflicts with, or interests that are adverse to, the
10 other class members.

11 14. I am not related to anyone at Matern Law Group, PC.

12 15. Throughout this case, I did the best I could to represent the class and to look out
13 for its interests. I recognize and accept that any resolution of the case is subject to court approval,
14 and must be in the best interests of the class as a whole.

15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct. Executed on September 17, 2026 at Diamond Bar, California.

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18 Albert Rudy Garcia (Sep 17, 2026 11:39:33 PDT)

19 ALBERT RUDY GARCIA
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