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Attorneys for Plaintiff
SANDI ORTIZ CUEVAS

[Additional Counsel Next Page]

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

SANDI ORTIZ CUEVAS and MARIA L.
YANEZ ZEPEDA, individually, on behalf of all
others similarly situated, and on behalf of the
State of California and other aggrieved persons;
JOSE LUIS RAMIREZ, individually, and on
behalf of all others similarly situated,

Plaintiffs,

v.

TMI AUTOMOTIVE PRODUCTS INC., a
California corporation; TMI PRODUCTS, INC.,
a California corporation; IPC IMPORT PARTS
CONNECTION INC., A California corporation;
and DOES 1 through 10,
inclusive,

Defendants.

Case No.: CVRI2304340

*[Assigned for All Purposes to the Hon.
Harold W. Hopp, Dept. 1]*

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

Preliminary Approval Hearing:

Date: January 22, 2026

Time: 8:30 a.m.

Dept: 1

Action Filed: August 21, 2023

1 Barbara DuVan-Clarke (SBN 259268)
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2 Alexandra Rose (SBN 329407)
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6 Attorney for Plaintiff
JOSE LUIS RAMIREZ
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14 Attorney for Plaintiff
MARIA YANEZ ZEPEDA
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1 I, David Alami, declare:

2 1. I am an attorney at law duly admitted to practice before all the courts of the State of
3 California and an attorney of record for Plaintiff MARIA L. YANEZ ZEPEDA. I am making this
4 declaration on behalf of the named Plaintiffs, the putative class members, and in support of Plaintiffs'
5 Motion for Preliminary Approval of Class Action and PAGA Settlement ("Motion"). I have personal
6 knowledge of the matters set forth herein, and, if called as a witness, could competently testify thereto.

7 2. I am currently a partner at Torus LLP. The Firm primarily prosecutes wage and hour
8 cases, including class and Private Attorneys General Act of 2004 ("PAGA") actions on behalf of
9 employees and others who have had their labor rights violated. The Firm and its attorneys, currently
10 serves as plaintiffs' counsel of record in over 100 wage and hour class and/or PAGA actions pending
11 throughout the State of California.

12 3. I was previously the founder and managing attorney at Alami Law Group, APC from
13 2020 to 2024 where I primarily handled wage and hour class and representative actions. Prior to
14 founding Alami Law Group, APC, I worked at the Am 100 rated law firms of Jones Day and Nixon
15 Peabody LLP where I gained extensive experience in most phases of litigation. At both firms, I handled
16 and obtained resolution of numerous consumer and commercial litigation focused matters

17 4. The attorneys working on this case have been appointed class counsel in many cases,
18 through both contested motions and settlement approval motions.

19 5. I have been appointed class counsel and/or had my attorney's fees approved in dozens of
20 class actions and/or representative PAGA actions.

21 6. I also serve as plaintiffs' counsel of record in several active employment class actions
22 and/or representative actions, including but not limited to: *Arellano v. Vision Scenery Corp., Inc.*, Case
23 No. 21STCV35878 (Los Angeles County Superior Court); *Arnold v. Loma Linda Health University, et*
24 *al.*, Case No. CIVSB2313303 (San Bernardino Superior Court); *Barron v. LA Apparel, Inc., et al.*, Case
25 No. 23STCV15452 (LA Superior Court); *Bermudez v. Rose Meat Services, Inc., et al.*, Case No.
26 23NWCV02948 (Los Angeles County Superior Court); *Bustillos v. California Wood Recycling, Inc., et*
27 *al.*, Case No. 37-2023-00043737-CU-OE-NC (San Diego County Superior Court); *Carrillo v.*
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1 *Southwind Foods, LLC, et al.*, Case No. 23CMCV00878 (Los Angeles County Superior Court); *Corona*
2 *v. Exquisite Apparel Corp, et al.*, Case No. 21STCV02421 (Los Angeles County Superior Court); *De*
3 *Herrera v. Vision Media Management & Fulfillment, LLC*, Case No. 23CHCV01640 (Los Angeles
4 County Superior Court); *Ghamrawi v. Boys & Girls Clubs of Silicon Valley*, Case No. 23CV419591
5 (Santa Clara County Superior Court); *Graham v. Global Customer Services, Inc., et al.*, Case No.
6 23VECV03731 (Los Angeles County Superior Court); *Marron v. Imperial CFS, Inc.*, Case No.
7 23STCV08329 (LA Superior Court); *Mayen v. Elsa Logistics LLC, et al.*, Case No. 22STCV40437 (Los
8 Angeles Superior Court); *Myers v. American Automobile Association of Northern California, Nevada*
9 *& Utah*, Case No. 23CV040857 (Alameda County Superior Court); *Perez v. Red Hot Chilis, Inc., et al.*,
10 Case No. 22STCV02369 (Los Angeles County Superior Court); *Ramirez v. J.J. Gourmet Food*
11 *Corporation, et al.*, Case No. 23STCV24732 (Los Angeles County Superior Court); *Vega v. Essel*
12 *Technology Services, Inc., et al.*, Case No. 23CV039446 (Alameda County Superior Court); *Villa v. Cal*
13 *Door and Drawer, Inc., et al.*, Case No. 23CV422688 (Santa Clara County Superior Court); and *Wood*
14 *v. Lyons Security Service, Inc., et al.*, Case No. 23NWCV02283 (Los Angeles County Superior Court).

15
16 7. Torus LLP has expended considerable time and effort on this case and will continue to
17 do so through final approval of the class action settlement.

18 8. Plaintiff Zepeda filed a wage and hour class and PAGA representative action in Riverside
19 County Superior Court, Case No. CVRI2305081 (“*Zepeda Action*”), on September 26, 2023, against
20 Defendants. Prior to filing, Plaintiff exhausted administrative remedies through the Labor and Workforce
21 Development Agency (“LWDA”) by filing a notice alleging facts and theories of liability regarding
22 several violations of the California Labor Code committed by Defendants. There was no response by the
23 LWDA regarding its intent to investigate the claims alleged in the notice for more than 65 days. As such,
24 Plaintiff Zepeda became authorized to commence a civil action under the PAGA.

25 9. On March 21, 2025, Plaintiffs Jose Luis Ramirez, Sandi Ortiz Cuevas, and Maria Yanez
26 Zepeda (collectively, “Plaintiffs”) and Defendants TMI Automotive Products, Inc., TMI Products,
27 Inc., and IPC Import Parts Connection Inc. (collectively, “Defendants”) (collectively, with Plaintiffs, the
28 “Parties”) participated in a formal mediation conducted by Christopher M. Barnes, a neutral and

1 respected mediator with extensive experience in complex wage and hour matters, and with the
2 assistance of the mediator's evaluations, the Parties were able to reach an agreement to resolve the
3 Ramirez Action, the case entitled *Sandi Ortiz Cuevas v. TMI Automotive Products Inc.*, Riverside
4 County Superior Court Case No. CVRI2304340, and the case entitled *Maria Yanez Zepeda v. TMI*
5 *Automotive Products Inc.*, Riverside County Superior Court Case No. CVRI2305081 (collectively,
6 "Actions"). The Parties then worked diligently to negotiate and memorialize the terms in a long form
7 settlement agreement.

8 10. On December 11, 2025, the Parties executed the Class Action and PAGA Settlement
9 Agreement ("Settlement" or "Settlement Agreement").

10 11. My office has been actively engaged in litigating this matter on behalf of Class Members.
11 During the course of this litigation, we have reviewed and analyzed numerous policy and pay documents,
12 including records and information produced by Defendant and worked to develop information on liability
13 and potential damages. Our investigations covered all aspects of the asserted claims, including
14 certification issues, merits issues, damages, the scope and configuration of Class Members, the content
15 and implementation of the wage and hour policies at issue, issues relating to manageability concerns at
16 trial, among other relevant areas. In addition, I participated in the mediation. Based on the expected
17 testimony from Plaintiffs and Class Members, a review of Defendants' policies and procedures and other
18 documents relating to the alleged claims, information on the number of Class Members, Class Members'
19 workweeks and pay periods, and a representative sample of Class Members' payroll data, the scope of
20 the potential damages to Plaintiffs and Class Members in light of the claims alleged, the uncertainty in
21 the law with regard to certification, and the negotiations that have taken place, I am convinced that the
22 proposed settlement is in the best interest of the class. Potential class certification issues, the uncertainty
23 of class certification, difficulties of complex litigation, the length process of establishing specific
24 damages and the possibility of appeals were carefully considered in reaching this agreement.

25 12. I have reviewed the Declarations of Plaintiffs' counsel and agree with their statements
26 regarding the case history, the assessment of the value of Plaintiffs' claims, the mediation that took place,
27 and the discovery and investigations performed.

13. The attorneys' fees incurred by Class Counsel are in line with the common fund requested. The Settlement Agreement provides for Class Counsel to apply for attorneys' fees in an amount of up to one-third (1/3) of the Gross Settlement Amount (i.e., \$180,666.67 if the Gross Settlement Amount is \$542,000.00) and actual litigation costs and expenses in an amount not to exceed Forty Thousand Dollars and Zero Cents (\$40,000.00), which will be paid out of the Gross Settlement Amount, subject to approval by the Court. Class Counsel has borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained.

Other Pending Actions
(CMO Paragraph G.3.a.vii)

14. Neither I nor anyone at my firm have any conflict of interest with either the *cy pres* beneficiary and or the designated settlement administrator.

15. I made reasonable inquiry of other members at Blackstone Law, APC, and I am not aware of any other pending actions against Defendants, other than the Actions, in any other Court that the Settlement may impact.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on December 26, 2025 in Irvine, California.



David Alami

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Case No.: CVRI2304340

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**DECLARATION OF SANDI ORTIZ
CUEVAS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

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DECLARATION OF SANDI ORTIZ CUEVAS

I, Sandi Ortiz Cuevas, declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration in support of my Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for Defendant TMI Automotive Products Inc. (“TMI Automotive Products”) from approximately July 2022 to approximately August 2023.

3. Based on my experience and knowledge of TMI Automotive Products’ wage-and-hour policies and my familiarity with their employment practices, I worked with my attorneys to bring claims on behalf of myself and other hourly-paid non-exempt employees of TMI Automotive Products.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to those of other hourly-paid non-exempt employees of TMI Automotive Products based on my experience working for TMI Automotive Products for over one (1) year. I believe we were all subject to the same employment policies and practices.

5. I do not have any conflicts with other hourly-paid non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid non-exempt employees at TMI Automotive Products.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by TMI Automotive Products’ company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by TMI Automotive Products.

7. I have always kept the best interests of the other hourly-paid non-exempt employees in mind while performing my duties as a named plaintiff in this case. I have been committed throughout the course of this case to prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the other

hourly-paid non-exempt employees by initiating this lawsuit, providing information to my attorneys, keeping in contact with my attorneys regarding the status of the case, meeting with my attorneys in advance of mediation, and reviewing the settlement agreement to make sure it was fair.

8. I will continue to actively participate in this lawsuit as necessary and will continue to make myself available to assist in this case moving forward as needed.

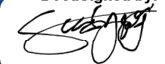
9. I do not have any actual or potential conflicts of interest with Class Members or the proposed Settlement Administrator, Apex Class Action Administration.

10. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by this Settlement.

11. I understand that Wilshire Law Firm, PLC; Blackstone Law, APC; and Torus LLP will share the attorneys' fees in this matter. I agreed to this in writing. I understand that the amount of attorneys' fees will not increase because of the fee sharing agreement.

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

Executed on 12/26/2025, at _____, California.

DocuSigned by:

 ABC381DBEC0415F...
 Sandi Ortiz Cuevas

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a California corporation; IPC IMPORT PARTS
CONNECTION INC., A California corporation;
and DOES 1 through 10,
inclusive,

Defendants.

Case No.: CVRI2304340

*[Assigned for All Purposes to the Hon.
Harold W. Hopp, Dept. 1]*

**DECLARATION OF JOSE LUIS
RAMIREZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

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1. I am over the age of eighteen (18) and a resident of the State of California. I am one of the named plaintiffs in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.
2. I was employed by Defendant TMI Automotive Products, Inc. ("TMI") as an hourly-paid, non-exempt employee from approximately June 2017 to approximately August 2021.
3. Because I thought the practices at TMI may not be lawful, I decided to seek legal advice about my work experiences at TMI and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps to make sure TMI was held accountable for not properly compensating its employees for all hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, and what it meant to bring a class action so that I understood what I was considering doing.
4. I have regularly conferred with my attorneys regarding the case as part of my responsibilities as a class representative. This process included searching for and providing documents concerning my employment with TMI, answering any questions my attorneys had about the documents, providing information regarding the company's practices and the duties of other hourly-paid and/or non-exempt employees, and helping my attorneys develop a strategy as to what additional documents and information they could seek to obtain from TMI.
5. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained. I made myself available to answer any questions my attorneys had about TMI's practices and treatment of its employees whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could.

DECLARATION OF PLAINTIFF JOSE LUIS RAMIREZ

1 6. I understood that in the event this matter did not settle and proceeded with trial, I would
2 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
3 responsibilities that are necessary for this lawsuit.

4 7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
5 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
6 also understood there was a risk of losing any job and/or income due to the time that I would have to
7 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. In
8 contrast, the other employees who will be receiving money from this lawsuit did not have to file a
9 claim or take the risk that I took in bringing this action.

10 8. I reviewed the settlement agreement, discussed the settlement agreement with my
11 attorneys, and asked them questions before signing it.

12 9. I believe that I have done everything that my attorneys have asked of me and tried, to
13 the best of my ability, to seek relief for the Class. I have spent approximately 45-50 hours participating
14 in this case as described above. I believe my efforts helped get the result obtained in this case.

15 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
16 approval, and any settlement must be designed in the best interest of the Class as a whole. At all times
17 throughout the course of this litigation I have considered the interests of the Class and put them before
18 my own personal interests.

19 11. I understand that incentive or enhancement awards are discretionary and intended to
20 compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and
21 other employees, the financial and/or reputational risk undertaken in bringing the class action, and an
22 acknowledgment of the benefits resulting from the representative's actions. I believe my work in this
23 matter is meritorious on these points for the reasons set forth above.

24 12. I respectfully request that the Court approve and award me a Service Payment in the
25 amount of \$7,500.00 for my efforts and active participation in the case and for the broader, general
26 release of all claims that I have or may have against TMI in connection with the settlement. Taking
27 into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

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13. I understand that Blackstone Law, APC, Wilshire Law Firm, P.L.C., and Torus LLP will share the attorneys' fees in this matter. I agreed to this in writing. I understand that the amount of attorneys' fees will not increase as a result of this fee sharing.

14. I am not related to anyone associated with Blackstone Law, APC, Wilshire Law Firm, P.L.C., and Torus LLP.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 12-11-25, at Riverside, California.

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**DECLARATION OF ALEXANDRA
ROSE IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
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1 attended all hearings; attended all mediations; coordinated with class action administrators; prepared
2 and worked with experts; first and second chaired multiple trials and arbitrations; and engaged in all
3 other intricate facets of litigation. During that time, he represented a wide range of clients from sole
4 proprietorships to Fortune 500 companies in state, federal, complex, and appellate courts. Many of
5 the cases he managed were highly publicized, with articles written about them in the Los Angeles
6 Times, Deadline, The Hollywood Reporter, Business Insider, Law360, and others. Super Lawyers has
7 regularly honored him as a Southern California Rising Star since 2012.

8 4. Barbara DuVan-Clarke is a 16-year litigator who joined Blackstone Law, APC in
9 September 2022 as a Senior Trial Attorney and Team Lead, building on her entire career of litigating
10 single-plaintiff employment, catastrophic injury, and class/PAGA matters with well-known plaintiff-
11 side wage and hour law firms in Los Angeles. She earned her Bachelor of Arts degree from the
12 University of California at Los Angeles in 2003, and then obtained her Juris Doctorate from Case
13 Western Reserve University in Cleveland, Ohio in 2007. Ms. DuVan-Clarke also maintains leadership
14 roles in the California Employment Lawyers' Association ("CELA") and other organizations.

15 5. Danielle L. GruppChang is a senior associate attorney at Blackstone Law, APC. She
16 graduated from California Polytechnic University San Luis Obispo in 2013, with a Bachelor of Arts
17 degree in Political Science with a minor in Communication Studies. She then obtained her Juris
18 Doctorate from University of California Law San Francisco (formerly known as University of
19 California Hastings College of the Law), graduating in 2016, and was admitted to the California State
20 Bar in January 2017. She has practiced exclusively plaintiff's side labor and employment class and
21 representative action law from 2017 through the present.

22 6. P.J. Van Ert is an accomplished attorney who joined Blackstone Law, APC in 2023,
23 after having worked at an employment litigation firm for 2 years, and prior to that, having served as a
24 District Attorney for over 13 years. In that role, she was a prolific trial attorney, and it is my
25 understanding that she tried over 50 jury trials to verdict. She graduated from University of California
26 at Davis in 2000, with a Bachelor of Arts degree, and from University of California at Los Angeles
27 School of Law with a Juris Doctorate in 2004. She was admitted to the State Bar of California in
28 December 2004.

1 7. I joined Blackstone Law, APC from a highly reputable employment law firm. I
2 graduated from the University of California, Los Angeles with a Bachelor of Arts degree in 2016 and
3 from New England Law | Boston with a Juris Doctor degree in 2019. I was admitted to the State Bar
4 of California in December of 2019 and the State Bars of New York and New Jersey in 2023. I am
5 additionally licensed in all federal district courts of California. I have worked on many wage and hour
6 class action and PAGA representative matters, and my work has included, *inter alia*, researching and
7 drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing stipulations
8 and settlement agreements, engaging in motion practice, claims evaluation and analysis, and making
9 court appearances. I manage the post-settlement department at Blackstone Law, APC. In that
10 capacity, I oversee and handle over 100 wage-and-hour putative class actions and/or representative
11 actions under PAGA that are in settlement.

12 8. Blackstone Law, APC has been counsel of record on several class action and PAGA
13 actions that have since been resolved, the most recent of which are attached hereto as **Exhibit 1**.

14 **Procedural History of the Ramirez Action**

15 9. On September 18, 2023, Plaintiff Ramirez filed a Class Action Complaint for Damages
16 (“Ramirez Complaint”) in the action entitled *Jose Luis Ramirez v. TMI Automotive Products Inc., et*
17 *al.*, Riverside County Superior Court Case No. CVRI2304905 (“Ramirez Action”), thereby
18 commencing a putative class action against TMI Automotive Products, Inc. and Kamran Staffing, Inc.
19 The Ramirez Complaint alleged nine (9) causes of action for violations of the California Labor Code
20 for failure to pay minimum wages, failure to pay overtime wages, failure to provide compliant meal
21 periods and premium payments in lieu thereof, failure to provide compliant rest periods and premiums
22 payments in lieu thereof, failure to timely pay wages during employment, failure to provide accurate
23 wage statements, failure to timely pay wages upon termination, and failure to reimburse necessary
24 business expenses, and for violations of California Business & Professions Code Section 17200, *et*
25 *seq.* based on the aforementioned California Labor Code violations.

26 10. On February 23, 2024, Defendant TMI Automotive Products, Inc. filed a Motion to (1)
27 Compel Arbitration and (2) Dismiss Class Claims (“Motion to Compel”) and supporting documents
28 in the Ramirez Action.

1 11. On April 18, 2024, Plaintiff Ramirez filed an Opposition to Defendant TMI
2 Automotive Products, Inc.’s Motion to Compel and supporting documents. On April 24, 2024,
3 Defendant TMI Automotive Products, Inc. filed a Reply in support of its Motion to Compel and
4 supporting documents. On April 25, 2024, Plaintiff Ramirez filed an Objection and Request to Strike
5 Defendant TMI Automotive Products, Inc.’s documents that were filed on April 24, 2024. On May 8,
6 2024, Plaintiff Ramirez filed supplemental briefing regarding his Objection and Request to Strike.

7 12. On August 6, 2024, the Court entered a Ruling on the Motion to Compel, which denied
8 the Motion to Compel.

9 13. On March 21, 2025, Plaintiffs Jose Luis Ramirez, Sandi Ortiz Cuevas, and Maria Yanez
10 Zepada (collectively, “Plaintiffs”) and Defendants TMI Automotive Products, Inc., TMI Products,
11 Inc., and IPC Import Parts Connection Inc. (collectively, “Defendants”) (collectively, with Plaintiffs,
12 the “Parties”) participated in a formal mediation conducted by Christopher M. Barnes, a neutral and
13 respected mediator with extensive experience in complex wage and hour matters, and with the
14 assistance of the mediator’s evaluations, the Parties were able to reach an agreement to resolve the
15 Ramirez Action, the case entitled *Sandi Ortiz Cuevas v. TMI Automotive Products Inc.*, Riverside
16 County Superior Court Case No. CVRI2304340, and the case entitled *Maria Yanez Zepeda v. TMI*
17 *Automotive Products Inc.*, Riverside County Superior Court Case No. CVRI2305081 (collectively,
18 “Actions”). The Parties then worked diligently to negotiate and memorialize the terms in a long form
19 settlement agreement.

20 14. On December 11, 2025, the Parties executed the Class Action and PAGA Settlement
21 Agreement (“Settlement” or “Settlement Agreement”).

22 ***Class Representative Service Payments***

23 15. As part of the Settlement Agreement, Plaintiffs are requesting reasonable Class
24 Representative Service Payments of Seven Thousand Five Hundred Dollars and Zero Cents
25 (\$7,500.00) each to Plaintiffs (total, \$22,500.00). These Class Representative Service Payments are
26 eminently reasonable given the time and effort Plaintiffs spent on this matter, and the benefit to the
27 Class Members as a result of Plaintiffs’ actions.

28 ///

1 ***Class Counsel Fees Payment and Class Counsel Litigation Expenses Payment***

2 16. The attorneys' fees incurred by Class Counsel are in line with the common fund
3 requested. The Settlement Agreement provides for Class Counsel to apply for attorneys' fees in an
4 amount of up to one-third (1/3) of the Gross Settlement Amount (i.e., \$180,666.67 if the Gross
5 Settlement Amount is \$542,000.00) and actual litigation costs and expenses in an amount not to exceed
6 Forty Thousand Dollars and Zero Cents (\$40,000.00), which will be paid out of the Gross Settlement
7 Amount, subject to approval by the Court. Class Counsel has borne all of the risks and costs of
8 litigation and will not receive any compensation until recovery is obtained.

9 17. The effectiveness of Class Counsel's prosecution of this matter has translated into
10 tangible monetary benefits as follows: (1) Class Members, the State of California, and Aggrieved
11 Employees will obtain monetary recovery over a relatively short period of time, as opposed to waiting
12 additional years for the same, or potentially worse, result; (2) a guaranteed result that compares
13 favorably with other similar class action settlements of this type, given the strengths and weaknesses
14 of the case; and (3) significant savings in Class Counsel's fees and/or costs that would have only
15 increased significantly had the case progress through certification, trial, and/or upon appeal.

16 18. Blackstone Law, APC has litigated this matter for over two years and was actively
17 preparing this matter for class certification and trial. Blackstone Law, APC will elaborate on the nature
18 of the legal services provided, the time incurred in performing those services, and its hourly rates at
19 the time of filing the Motion for Final Approval. Blackstone Law, APC will also elaborate on its
20 reimbursement costs at the time of filing the Motion for Final Approval.

21 ***Other Pending Actions***

22 **(CMO Paragraph G.3.a.vii)**

23 19. I made reasonable inquiry of other members at Blackstone Law, APC, and I am not
24 aware of any other pending actions against Defendants, other than the Actions, in any other Court that
25 the Settlement may impact.

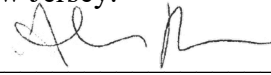
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1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct.

3 Executed on December 23, 2025, at Jersey City, New Jersey.

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6 Alexandra Rose
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EXHIBIT 1

- *Jully Mullings v. Antelope Ambulance Service*, Los Angeles County Superior Court, Case No. 23STCV30241, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Maria Martina Aleman v. Holding Hands OPCO LLC dba Holding Hands, Inc.*, Los Angeles County Superior Court, Case No. 24STCV25240, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Vanessa Vazquez v. Cliffs Resort LLC*, San Luis Obispo County Superior Court, Case No. 24CV-0025, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Javier Hernandez, Jr. v. DGDG I, LLC, et al.*, Santa Clara County Superior Court, Case No. 23CV416770, approved as counsel, in association with other counsel, in settlement of representative wage and hour action pursuant to PAGA.
- *Juan Manuel Munoz v. MGA Entertainment, Inc.*, Los Angeles County Superior Court, Case No. 23STCV06386, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Mayra Campos Molina, et al. v. Harbor Hotels, LLC*, Los Angeles County Superior Court, Case No. 23STCV10683, approved as counsel in final settlement of wage and hour class and PAGA action.
- *William Sykes, IV, et al. v. Wente Bros.*, Alameda County Superior Court, Case No. 23CV048758, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Jose Padilla, et al. v. WEHO Hospitality Sunset, LLC*, Los Angeles County Superior Court, Case No. 23STCV01072, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Marvin Morales v. Skurka Aerospace, Inc.*, Los Angeles County Superior Court, Case No. 24STCV12893, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.

- *Tyler Krug, et al. v. EKC Enterprises, Inc.*, Kern County Superior Court, Case No. BCV-23-103975, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Joseph Amyot v. Silverthorn Resort, Inc.*, Shasta County Superior Court, Case No. 23CV-0203487, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Marissa Hartman v. Napa LP Hospitality Corporation*, Napa County Superior Court, Case No. 23CV00116, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Lesly Arreguin, et al. v. Intercare Therapy, Inc.*, Los Angeles County Superior Court, Case No. 23STCV27972, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Alma Lopez, et al. v. Advanced Manufacturing and Development, Inc.*, Mendocino County Superior, Case No. 23CV000673, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Brittini Aghedo, et al. v. Villa Esperanza Services*, Los Angeles County Superior Court, Case No. 23STCV27362, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Robin Jennings v. Mizuho Orthopedic Systems, Inc. dba Mizuho OSI*, Alameda County Superior Court, Case No. 24CV070891, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Jonathan Martin v. Atlas Digital, LLC*, Los Angeles County Superior Court, Case No. 23STCV30498, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Cynthia Molt v. Los Angeles Film School, LLC*, Los Angeles County Superior Court, Case No. 23STCV30757, approved as counsel in final settlement of wage and hour class and PAGA action.

- *William Ramirez v. Employer Solutions Staffing Group LLC*, Los Angeles County Superior Court, Case No. 23STCV24735, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Anu Verma v. SingerLewak LLC*, Los Angeles County Superior Court, Case No. 24STCV11344, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Toby Lanzarin, et al. v. Building Material Distributors, Inc.*, Sacramento County Superior Court, Case No. 34-2022-00330343-CU-OE-GDS, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Kassandra Herndon, et al. v. Agreeya Solutions, Inc.*, San Joaquin County Superior Court, Case No. STK-CV-UOE-2023-0002783, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Damon Siler, et al. v. Call-The-Car dba Call the Car*, Los Angeles County Superior Court, Case No. 24STCV07514, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Daniel Ochoa-Lopez v. CorTech West Staffing, LLC, et al.*, Los Angeles County Superior Court, Case No. 23STCV19480, approved as counsel in settlement of representative wage and hour action pursuant to PAGA
- *Juan Escobedo v. Block Tops, Inc.*, Orange County Superior Court, Case No. 30-2023-01356309-CU-OE-CXC, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Antonio Quintero v. Weyerhaeuser NR Company*, Los Angeles County Superior Court, Case No. 23STCV02624, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Cristo Hernandez v. Eldorado National (California), Inc.*, Riverside County Superior Court, Case No. CVRI2201056, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.

- *Rigoberto Tecaliz v. National Restaurant Inc. dba Black Bear Diner*, San Diego County Superior Court, Case No. 37-2023-00046906-CU-OE-CTL, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Cecilia Estrada v. The Roman Catholic Archbishop of Los Angeles*, Los Angeles County Superior Court, Case No. 24STCV07184, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Alexander Davis v. JAJ Roofing dba Citadel Roofing and Solar*, Sacramento County Superior Court, Case No. 23CV011004, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Aurelio Aguilar v. Supreme Car Wash, Inc.*, Los Angeles County Superior Court, Case No. 21STCV29696, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Aaron Coffey v. Catalina Channel Express, Inc.*, Los Angeles County Superior Court, Case No. 21STCV41396, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Djuana Shanella Hale, et al. v. Welbe Health, LLC, et al.*, San Joaquin County Superior Court, Case No. STK-CV-UOE-2023-0006866, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Mario Fosados v. Drew Chain Security Corp.*, Los Angeles County Superior Court, Case No. 24STCV00519, approved as counsel in in settlement of representative wage and hour action pursuant to PAGA.
- *Jose Manuel Amaro Bernal v. Joseph Holt Plastering, Inc.*, Los Angeles County Superior Court, Case No. 24STCV15637, approved as counsel in in settlement of representative wage and hour action pursuant to PAGA.
- *Brandon Geston v. FRTO LLC, et al.*, Fresno County Superior Court, Case No. 24CECG01292, approved as counsel in in settlement of representative wage and hour action pursuant to PAGA.

- *Alfonso Herrera v. W.L. Butler Construction, Inc., et al.*, Orange County Superior Court, Case No. 30-2023-01335445-CU-OE-CXC, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Marcos Ojendiz, et al. v. Jonathan Louis International*, Los Angeles County Superior Court, Case No. 21STCV35253, approved as counsel in in settlement of representative wage and hour action pursuant to PAGA.
- *Emmanuel Caldera v. Zeb's World Famous Boathouse Inc. dba Goat Hill Tavern*, Orange County Superior Court, Case No. 30-2023-01310801-CU-OE-CXC, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Alex Javier Nakamoto v. Skydio, Inc.*, Alameda County Superior Court, Case No. 24CV062913, approved as counsel in in settlement of representative wage and hour action pursuant to PAGA.
- *Jason McEntee v. Roche Molecular Systems, Inc.*, Alameda County Superior Court, Case No. 23CV041360, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Alexzander Roberts, et al. v. Lemonade Restaurant Group*, Los Angeles County Superior Court, Case No. 22STCV38302, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Halla Knotts v. Launch Technical Workforce Solutions, LLC*, San Bernardino County Superior Court, Case No. CIVSB2332568, approved as counsel, in association with other counsel, in settlement of representative wage and hour action pursuant to PAGA.
- *Armando Gastelum v. Premier Trailer Manufacturing, Inc.*, Tulare County Superior Court, Case No. VCU300333, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Tiffany Patterson v. Black Mountain Healthcare, LLC., d/b/a Seaport Home Health & Hospice*, San Diego County Superior Court, Case No. 37-2023-00037563-CU-

OE-CTL, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.

- *Angel Rodriguez v. American Textile Maintenance*, Los Angeles County Superior Court, Case No. 22STCV17855, approved as counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Rita Ray v. Families Together of Orange County*, Orange County Superior Court, Case No. 30-2023-01324555-CU-OE-CXC, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Ly Hai v. Sunroad HS Auto, Inc.*, San Diego County Superior Court, Case No. 37-2022-00025788-CU-OE-CTL, approved as counsel, in association with other counsel, in settlement of representative wage and hour action pursuant to PAGA.
- *Anabel Perez v. Eureka Specialties, Inc.*, Los Angeles County Superior Court, Case No. 22STCV35940, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Jose Luis Galicia v. Virco, Inc., et al.*, Los Angeles County Superior Court, Case No. 23STCV29425, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Rene Umana v. Columbus Technologies*, Los Angeles County Superior Court, Case No. 22STCV16432, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Sitara Nayabhil v. San Francisco SPCA (dba SFSPCA), a California 501(c)(3) non-profit organization*, San Francisco County Superior Court, Case No. CGC-23-609950, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Fernando Solis v. Tuff Shed, Inc.*, Los Angeles County Superior Court, Case No. 24VECV00368, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.

- *Tyler Emery v. Santa Cruz Bicycles, LLC*, Santa Cruz Superior Court, Case No. 24CV00244, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Odalys Montejo v. Team Nissan LLC*, Ventura County Superior Court, Case No. 2023CUOE017853, approved as counsel in settlement of representative wage and hour action pursuant to PAGA
- *Vanessa Cortes v. Giti Tire (USA) LTD*, San Bernardino County Superior Court, Case No. CIVSB2332578, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Travis Sanford v. Santa Cruz Seaside Company*, Santa Cruz County Superior Court, Case No. 23CV01762, approved as counsel in final settlement of wage and hour class and PAGA action.
- *Jered Ortega v. YMCA of San Diego County*, San Diego County Superior Court, Case No. 37-2023-00043645-CU-OE-CTL, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Corina Martinez v. Stagnaro Bros. Seafood, Inc.*, Santa Cruz County Superior Court, Case No. 24CV00082, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Alejandra Jimenez v. ClearFreight, Inc.*, Los Angeles County Superior Court, Case No. 23STCV28938, approved as counsel, in association with other counsel, in settlement of representative wage and hour action pursuant to PAGA.
- *Jazzmin Cortez v. Millard Mall Services, Inc.*, Riverside County Superior Court, Case No. CVRI2104010, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Christa Morton, et al. v. PSI Services, LLC*, Fresno County Superior Court, Case No. 24CECG00039, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.

- *Michael Bravo v. Michels Pacific Energy, Inc.*, Santa Clara County Superior Court, Case No. 22CV403427, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Daniel Rodriguez v. Republique, LLC*, Los Angeles County Superior Court, Case No. 23STCV14521, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Theresa Bendorf, et al. v. Sea World LLC, et al.*, San Diego County Superior Court, Case No. 37-2021-00034922-CU-OE-CTL, approved as class counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Victor De La Cruz v. Northwest Pipe Company*, San Bernardino County Superior Court, Case No. CIVSB2211140, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Bobby Birdi v. Lucid USA, Inc.*, Alameda County Superior Court, Case No. 21CV003541, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Jose Trujillo, et al. v. Producers Dairy Foods, Inc.*, Sacramento County Superior Court, Case No. 34-2022-00313753, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *David Williams v. Rancho Nicasio, LLC*, Marin County Superior Court, Case No. CIV2203067, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Alexander Jackson v. Lifecare Assurance Company*, Los Angeles County Superior Court, Case No. 23STCV26579, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Alexis Cardoza v. BHFC Operating LLC*, Los Angeles County Superior Court, Case No. 21STCV34040, approved as counsel in settlement of representative wage and

hour action pursuant to PAGA.

- *Maria Ayala, et al. v. SDH Services West, LLC*, Kern County Superior Court, Case No. BCV-21-101933, approved as class counsel in final settlement of wage and hour class action.
- *Alfredo Sanchez v. Greenworld, Inc.*, Riverside County Superior Court, Case No. CVRI2105756, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Oscar Bryant v. Midwest Construction Services, Inc. dba Trillium*, San Bernardino County Superior Court, Case No. CIVSB2121529, approved as class counsel in final settlement of wage and hour class action.
- *Matthew Savattieri v. AMI Expeditionary Healthcare, LLC, et al.*, Los Angeles County Superior Court, Case No. 21STCV33372, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Lexy Barajas, et al. v. H. W. Hunter, Inc.*, Los Angeles County Superior Court, Case No. 22STCV01892, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Alejandro Valdez v. C.H.I. Automart, Inc.*, Los Angeles County Superior Court, Case No. 21STCV40168, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Sheizan Bawa v. Meathead Movers, Inc.*, Orange County Superior Court, Case No. 30-2021-01211895-CU-OE-CXC, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Tanisha Lopez, et al. v. Restorix Health, Inc.*, Los Angeles County Superior Court, Case No. 21STCV33067, approved as class counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Perla Soto, et al. v. Nippon Express U.S.A., Inc.*, Los Angeles County Superior Court, Case No. 21STCV24902, approved as class counsel in final settlement of wage and

hour class and PAGA action.

- *Angel Garcia, et al. v. J&B Investments, Inc., et al.*, San Bernardino County Superior Court, Case No. CIVSB2208601, approved as class counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Sindy Aviles, et al. v. Freeway Insurance Services America, LLC*, Los Angeles County Superior Court, Case No. 21STCV34864, approved as counsel, in association with other counsel, in settlement of representative wage and hour action pursuant to PAGA.
- *Alexander Gnaedig, et al. v. Favorite Healthcare Staffing, Inc.*, Los Angeles County Superior Court, Case No. 21STCV20904, approved as class counsel, in association with other counsel, in final settlement of wage and hour class and PAGA action.
- *Richard Evans v. My Paint Stop, LLC, et al.*, Contra Costa County Superior Court, Case No. MSC21-01812, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Jose Luis Parada George v. Main Electric Supply Company, LLC, et al.*, Orange County Superior Court, Case No. 30-2021-01220136-CU-OE-CXC, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.
- *Samia Salazar Yunis v. Sharif Jewelers*, Sacramento County Superior Court, Case No. 34-2020-00290080, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Daniel Analco v. Felix Chevrolet, LP, et al.*, Los Angeles County Superior Court, Case No. 21STCV36654, approved as class counsel in final settlement of wage and hour class and PAGA action.
- *Sasha Aiono v. Benefit Cosmetics*, Los Angeles County Superior Court, Case No. 21STCV33719, approved as counsel in settlement of representative wage and hour action pursuant to PAGA.

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Attorneys for Plaintiff
SANDI ORTIZ CUEVAS

[Additional Counsel Next Page]

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

SANDI ORTIZ CUEVAS and MARIA L.
YANEZ ZEPEDA, individually, on behalf of all
others similarly situated, and on behalf of the
State of California and other aggrieved persons;
JOSE LUIS RAMIREZ, individually, and on
behalf of all others similarly situated,

Plaintiffs,

v.

TMI AUTOMOTIVE PRODUCTS INC., a
California corporation; TMI PRODUCTS, INC.,
a California corporation; IPC IMPORT PARTS
CONNECTION INC., A California corporation;
and DOES 1 through 10,
inclusive,

Defendants.

Case No.: CVRI2304340

*[Assigned for All Purposes to the Hon.
Harold W. Hopp, Dept. 1]*

**DECLARATION OF MARIA YANEZ
ZEPEDA IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Preliminary Approval Hearing:

Date: January 22, 2026

Time: 8:30 a.m.

Dept: 1

Action Filed: August 21, 2023

1 Barbara DuVan-Clarke (SBN 259268)
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2 Alexandra Rose (SBN 329407)
arose@blackstonepc.com
3 **BLACKSTONE LAW, APC**
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6 Attorney for Plaintiff
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14 Attorney for Plaintiff
MARIA YANEZ ZEPEDA
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1. I have personal knowledge of the facts in this declaration and if called to testify, I could and would do so under oath. I make this declaration in support of my Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I am a former employee of TMI AUTOMOTIVE PRODUCTS INC., TMI PRODUCTS, INC., IPC IMPORT PARTS CONNECTION INC. (“Defendants”). I was employed as an hourly employee of Defendants from approximately January 22, 2020 to June 13, 2023.

3. Through my attorneys, I take on the responsibilities of the class representative in the lawsuit against Defendants. In connection with this lawsuit and as the class representative, I believe that Defendants did not pay me and other employees all our wages, did not provide us with proper meal and rest breaks, did not provide us with accurate wage statements, did not provide us all our wages when our employment ended, and did not reimburse us for our out-of-pocket work expenses.

4. During my employment, I was very familiar with Defendants' employment policies and practices. I believe that my knowledge and experience helped my attorneys reach a settlement in this case.

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5. I spent approximately 45 hours performing my duties as a plaintiff in this class action case, and I remain committed to performing the duties of a class representative.

6. Throughout the case, I participated in many conversations with my attorneys to be as informed as I could be about what class action cases are, how class actions affect class members, the steps and risks involved in litigating class actions, the strengths and weaknesses of the claims, what would be required of me as a class representative, and the status of the case.

7. I spent time going over documents with my attorneys and their staff, described Defendants' policies and practices, and answered questions about my work experience.

8. I also assisted my attorneys to prepare for mediation and made myself available on the day of the mediation to answer any questions from my attorneys.

9. I reviewed the terms of the settlement with my attorneys to understand the terms and

1 the process for settling class action cases.

2 10. Even while the settlement agreement was being negotiated, I communicated with my
3 attorneys for updates on the case. I wanted to know when the next hearings were so I could try to be
4 available if my attorneys needed my help.

5 **Risks and Responsibilities of Becoming the Named Plaintiff**

6 11. When I decided to become involved in this lawsuit as a potential class representative,
7 I understood that I was seeking compensation for not only myself, but also for all other class
8 members who worked for Defendants. By doing so, I understood that I would be delaying my own
9 recovery for the benefit of other class members.

10 12. By pursuing the case as a class action, I waited over a year to be able to request that
11 I be appointed the class representative and will have to wait longer to receive any monetary award
12 in this case due to the additional steps for settling a class action lawsuit.

13 13. As a named plaintiff, I was aware that there were risks involved and that the case
14 could continue for several years, requiring my attention, services, and time throughout the entire
15 case. Even if we won at trial, I learned that there could be more delays by appeals.

16 14. Even with the risks, I was willing to act on behalf of other employees, but I was
17 concerned about how long it could take for the case to be resolved, about losing the case, having a
18 judgment filed against me for costs, or losing job opportunities in the future.

19 **Enhancement Award**

20 15. Even with the risks, I performed the necessary duties to help prosecute the case
21 against the Defendants. I offered to help my attorneys and the class members throughout the case
22 and tried to represent the class to the best of my ability. I decided to be the class representative to
23 minimize the risk that no other class member would have undertaken these responsibilities,
24 especially for those who might have been afraid of being involved in these kinds of lawsuits.

25 16. I understand that I may be entitled to an additional payment for my role as a class
26 representative and my work related to this case. I understand that this additional payment is not
27 guaranteed and needs the Court's approval. Taking into consideration the time I dedicated to this
28 case and the results achieved on behalf of other class members, I believe that the requested

1 enhancement award is reasonable. My opinion about the fairness of the settlement in this case is not
2 based on this potential payment.

3 17. I do not have any involvement or interests with the settlement administrator. I am not
4 aware of any interests I have that are adverse to the interests of the class, and I do not have any
5 conflicts that would keep me from representing other class members.

6 18. I believe that I demonstrated my dedication to helping reach the settlement and
7 helping my attorneys throughout the case for the benefit of the class members. If appointed as the
8 class representative, I will continue to dedicate my time and effort to assisting my attorneys and
9 representing the class members' interests until this case is resolved.

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

12 Executed on 12/26/2025 at corona, California.

13 Maria L. Yanez Zepeda
14 Maria L. Yanez Zepeda (Dec 26, 2025 14:03:25 PST)

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