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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

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

JOSHUA TRCKA and TY SPRAGGINS,  
individually, on a representative basis, and  
on behalf of all others similarly situated;

Plaintiffs,

vs.

ROTOCO, LLC, a California Limited  
Liability Company; and DOES 1 through  
20, inclusive;

Defendants.

Case No.: CVRI2304897  
*[Assigned to Hon. Harold Hopp, Dept 1, for all  
purposes]*

**DECLARATION OF PLAINTIFF TY  
SPRAGGINS**

Hearing

Date: January 21, 2026

Time: 8:30 a.m.

Dept.: 1

I, Ty Spraggins, state and declare:

1. I am one of the Plaintiffs in the above captioned action. I have personal knowledge of all matters stated herein and could competently testify thereto. I make this declaration in support of the motion for preliminary approval of the class action settlement. I believe the settlement is fair and reasonable and is a fair resolution of the claims alleged.

2. During and after my employment with RotoCo, I believed there were issues with my pay and other aspects of my employment. For that reason, I spoke with my eventual attorneys and learned that there was an ongoing class action and that I had the option to be added to the case to help represent the class members. In this regard, when I chose to move forward to

1 be added to this class action, I knew that I had specific burdens as the “Class Representative,”  
2 which included: (a) representing the interests of all class members, (2) considering the interests  
3 of all class members above my own personal interests, (3) participating actively in the lawsuit,  
4 including potential testimony at deposition and trial, and keeping generally aware of the status  
5 and progress of the lawsuit. Moreover, I understood that any resolution of the lawsuit is subject  
6 to court approval and must be designed in the best interests of the class as a whole.

7         3. I understand that, in bringing this case as a class action, I have a duty to serve the  
8 interests of the Class as a whole. Since joining the case, I have done so - I have actively helped  
9 my attorneys in various ways and have made myself available when needed. For example, I  
10 assisted my attorneys by gathering documentation regarding the claims in this case and  
11 participated in calls to explain and discuss the company’s practices and their general practices  
12 and procedures, locating and analyzing company documents, among others. I have also reviewed  
13 all settlement documents and believe that this settlement is fair for the class. Finally, I will  
14 continue to take all steps necessary to finalize this settlement and obtain court approval.

15         4. I have no conflicts with the proposed class members, am an adequate and typical  
16 class representative since I was subjected to the same company-wide practices in terms of  
17 payment of wages, meal and rest breaks, among other claims, and will continue to assist with the  
18 litigation and prosecute the case on behalf of the other employees.

19         5. I respectfully request that the court preliminarily approve the service award. As  
20 outlined above, I have performed substantial services for the Class and helped obtain a highly  
21 beneficial settlement for my fellow employees. And I have also agreed to waive all of my claims  
22 against the company as part of this settlement. At the final approval stage, I will submit an  
23 additional declaration setting forth all the work I did for this case, including an estimated number  
24 of hours spent assisting the Class and my attorneys.

25         I declare under penalty of perjury under the laws of the State of California that the  
26 foregoing is true and correct. Executed on Dec 18, 2025, at Lake Elsinore, California.

27  
28 By:   
Ty Spraggins (Dec 18, 2025 12:28:42 PST)  
Ty Spraggins