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Attorneys for Defendant RotoCo, LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA
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 FREYAAN Y.
KARANJIA IN SUPPORT OF
PLAINTIFFS' UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Hearing

Date: January 21, 2026

Time: 8:30 a.m.

Dept.: 1

1 I, Freyaan Y. Karanjia, declare as follows:

2 1. I am a Partner of Ames Karanjia LLP, attorneys of record for Defendant RotoCo,
3 LLC (“Defendant”) in the above-entitled matter, and am licensed to practice before this Court. I
4 have personal knowledge of the following facts and, if called as a witness, could and would testify
5 competently thereto.

6 2. This declaration is submitted in support of Plaintiffs’ unopposed motion for
7 preliminary approval of the proposed class action and PAGA settlement, and pursuant to paragraph
8 G(3)(b) of the Court’s Case Class Action Case Management Order #1, issued on September 20,
9 2023.

10 3. Based on my representation of Defendant in this matter, including my review of the
11 allegations and claims asserted by Plaintiffs, and my knowledge of class, representative, and
12 collective actions of this nature, I am not aware of any class action, representative action, or other
13 collective action pending in any other court, in this or any other jurisdiction, that asserts claims
14 similar to those asserted in this action on behalf of a class or group of individuals some or all of
15 whom would also be members of the class defined in this action.

16 4. Accordingly, I am not aware of any other action that would require identification of a
17 case name, case number, class or representative definition, nature of the claims asserted, or
18 procedural status under paragraph G(3)(b) of the Court’s Case Management Order.

19
20 I declare under penalty of perjury under the laws of the State of California that the foregoing
21 is true and correct.

22 Executed this 18th day of December 2025 at San Diego, California.

23 

24 _____
25 Freyaan Y. Karanjia