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Attorneys for Plaintiffs PARKER CRAWLEY, CASSIA CARRAWAY, CHARLES DAVIS, HUCKLEBERRY TAYLOR
Individually and on behalf of the Certified Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

(UNLIMITED JURISDICTION)

PARKER CRAWLEY, CASSIA CARRAWAY, CHARLES DAVIS, AND HUCKLEBERRY TAYLOR individually and on behalf of others similarly situated,

Plaintiffs,

vs.

RISE ENERGY, LLC, a limited liability company; NUSUN POWER, LLC, a limited liability; JORDAN KENT BINNING, an individual; CHARLES LAZARUS, an individual; JACOB HARRISON, an individual; and DOES 1 through 100, inclusive,

Defendants.

CASE NO. 30-2023-01336866-CU-OE-CXC
Assigned to: Hon. Melissa R. McCormick

CLASS ACTION
Complaint Filed: July 7, 2023
FAC Filed: August 15, 2023
SAC Filed: December 7, 2023

SECOND SUPPLEMENTAL DECLARATION OF THOMAS SOLMER IN SUPPORT OF PLAINTIFF'S NOTICE OF MOTION AND UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT

DATE: October 22, 2026
TIME: 2:00 P.M.
PLACE: Dept. CX105

I, Thomas Solmer, declare and state as follows:

1. I am over the age of 18 and competent to testify about the matters set forth in this declaration. I have personal knowledge of the facts set forth in this declaration. I am an attorney licensed to appear before all courts of the State of California and counsel of record for Plaintiffs herein.

2. Attached as Exhibit 'A' is a true and correct copy of a declaration of Plaintiff Cassia Carraway signed February 25, 2025, which was served and intended to have been filed with the original motion for preliminary approval of settlement.

3. Attached as Exhibit 'B' is a true and correct copy of a declaration of Plaintiff Parker Crawley signed February 25, 2025, which was served and intended to have been filed with the original motion for preliminary approval of settlement.

4. Attached as Exhibit 'C' is a true and correct copy of a declaration of Plaintiff Charles Davis signed February 25, 2025, which was served and intended to have been filed with the original motion for preliminary approval of settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 9, 2026 at Irvine, California.



Thomas Solmer

Exhibit A

Exhibit A

Docusign Envelope ID: 38CD8F71-1CE8-4846-92F2-9C97C0E49F03

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(UNLIMITED JURISDICTION)

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Plaintiffs,

vs.

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Defendants.

CASE NO. 30-2023-01336866-CU-OE-CXC
Assigned to: Hon. Melissa R. McCormick

CLASS ACTION
Complaint Filed: July 7, 2023
FAC Filed: August 15, 2023
SAC Filed: December 7, 2023

DECLARATION OF CASSIA CARRAWAY IN SUPPORT OF PLAINTIFF'S NOTICE OF MOTION AND UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

DATE:
TIME: A.M.
PLACE: Dept. CX104

Docusign Envelope ID: 38CD8F71-1CE8-4846-92F2-9C97C0E49F03

I, Cassia Carraway, declare and state as follows:

1. I am over the age of 18 and competent to testify about the matters set forth in this declaration. I have personal knowledge of the facts set forth in this declaration. I am a named plaintiff in this case.

2. My statements in this declaration concern the period of time I worked selling solar products for the Defendant. I worked for Defendant from about October to December of 2022.

3. During the time I worked for the Defendant, I was not paid as an employee, but an independent contractor. I worked full-time for Defendant for more than two months and was paid only $150 total.

4. I understand that in July 2024 the parties mediated and agreed to a settlement in this matter during which I provided information about my experiences and those of my fellow class members on behalf of the class.

5. I have always striven to look out for the class's best interest and have discharged my duties as class representative to the best of my ability.

6. For instance, I have assisted Class Counsel at every stage of this proceeding. I have been informed of and considered my duties as a class representative, and since the beginning I have been motivated to seek a resolution of these claims which is fair to all the other persons affected. I learned that my co-worker Parker Crawley was pursuing legal action against Defendant and wanted to be involved so that I could help. I spoke with attorney Thomas Solmer several times over a period of time to discuss my experience before the Complaint was filed, including all the details of our routes and procedures as "setters," how we were paid, and how we were charged for housing. I reviewed the Complaint and provided my feedback on it to counsel. I have been in contact with Class Counsel regularly to check the status of the matter and provide additional information, including to help analyze the materials obtained in preparation for mediation. I participated in the mediation by phone and subsequently reviewed and scrutinized the settlement agreement. I have thus remained in close contact with Class Counsel at all times throughout this lengthy proceeding.

7. I understand that as a class representative, I will continue to have significant

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involvement in the case. I estimate that, from the time I started working with my attorneys to the present day, I have devoted in excess of 30 hours of my time attempting to work with my attorneys and to ensure that the case would move forward to the best of my ability.

8. I understand that because I am to receive an enhancement payment, I am entering into a comprehensive release of *all claims, known and unknown*, unlike the rest of the Class Members, who are releasing only those claims that were or could have been litigated based on the facts alleged in the operative Complaint.

9. Also, due to my fee agreement with Class Counsel, I understand that I would have been obligated to pay for all costs arising out of the litigation; if the case had not resolved in our favor. These costs could have been substantial for someone making a modest living, and my agreement to take on these costs put me at great financial risk.

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

Executed on 2/25/2025 at Orange County, California.

DocuSigned by:
23AADC8F36694B3...
Cassia Carraway

Exhibit B

Exhibit B

Docusign Envelope ID: 39978B80-C64E-4BF3-8E13-3C55B56A8D2E

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Attorneys for Plaintiffs PARKER CRAWLEY, CASSIA CARRAWAY, CHARLES DAVIS, HUCKLEBERRY TAYLOR
Individually and on behalf of the Certified Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

(UNLIMITED JURISDICTION)

PARKER CRAWLEY, CASSIA CARRAWAY, CHARLES DAVIS, AND HUCKLEBERRY TAYLOR individually and on behalf of others similarly situated,

Plaintiffs,

vs.

RISE ENERGY, LLC, a limited liability company; NUSUN POWER, LLC, a limited liability; JORDAN KENT BINNING, an individual; CHARLES LAZARUS, an individual; JACOB HARRISON, an individual; and DOES 1 through 100, inclusive,

Defendants.

CASE NO. 30-2023-01336866-CU-OE-CXC
Assigned to: Hon. Melissa R. McCormick

CLASS ACTION
Complaint Filed: July 7, 2023
FAC Filed: August 15, 2023
SAC Filed: December 7, 2023

DECLARATION OF PARKER CRAWLEY IN SUPPORT OF PLAINTIFF'S NOTICE OF MOTION AND UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

DATE:
TIME: A.M.
PLACE: Dept. CX104

Docusign Envelope ID: 39978B80-C64E-4BF3-8E13-3C55B56A8D2E

I, Parker Crawley, declare and state as follows:

1. I am over the age of 18 and competent to testify about the matters set forth in this declaration. I have personal knowledge of the facts set forth in this declaration. I am a named plaintiff in this case.

2. My statements in this declaration concern the period of time I worked selling solar products for the Defendant. I worked for the Defendant from about October of 2022 to February of 2023.

3. During the time I worked for the Defendant, I was not paid as an employee, but an independent contractor. I worked full-time for Defendant for about three months in 2022 and was paid $3,100. I worked full-time for Defendant for six weeks in 2023 and was paid $1,800. These amounts were reported on 1099 forms.

4. I understand that in July 2024 the parties mediated and agreed to a settlement in this matter during which I provided information about my experiences and those of my fellow class members on behalf of the class.

5. I have always striven to look out for the class's best interest and have discharged my duties as class representative to the best of my ability.

6. For instance, I have assisted Class Counsel at every stage of this proceeding. I contacted attorney Thomas Solmer based on my experience with a previous matter and because I believed his firm could handle this matter appropriately. I have been informed of and considered my duties as a class representative, and since the beginning I have been motivated to seek a resolution of these claims which is fair to all the other persons affected. I put Mr. Solmer in contact with several of my co-workers, including co-Plaintiffs Ms. Carraway and Mr. Davis, along with other former employees of Defendant, and I consulted with Mr. Solmer regarding the facts in great detail prior to the filing of the Complaint. I reviewed and gave feedback on the Complaint and subsequent pleadings, along with checking in regularly to check the status and provide additional information. Counsel shared information which was obtained in preparation for mediation and we discussed strategy, expectations, and further details on the facts. I participated in the mediation by phone and subsequently reviewed

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and scrutinized the settlement agreement. I have thus remained in close contact with Class Counsel at all times throughout this lengthy proceeding.

7. I understand that as a class representative, I will continue to have significant involvement in the case. I estimate that, from the time I started working with my attorneys to the present day, I have devoted in excess of 40 hours of my time attempting to work with my attorneys and to ensure that the case would move forward to the best of my ability.

8. I understand that because I am to receive an enhancement payment, I am entering into a comprehensive release of *all claims, known and unknown*, unlike the rest of the Class Members, who are releasing only those claims that were or could have been litigated based on the facts alleged in the operative Complaint.

9. Also, due to my fee agreement with Class Counsel, I understand that I would have been obligated to pay for all costs arising out of the litigation; if the case had not resolved in our favor. These costs could have been substantial for someone making a modest living, and my agreement to take on these costs put me at great financial risk.

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

Executed on 2/25/2025 at Lake forest, California.

Signed by:
Parker Crawley
379412C4A48947F...

Parker Crawley

Exhibit C

Exhibit C

Docusign Envelope ID: 17A95309-044C-4C94-B575-EBA9240A16E4

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Attorneys for Plaintiffs PARKER CRAWLEY, CASSIA CARRAWAY, CHARLES DAVIS, HUCKLEBERRY TAYLOR
Individually and on behalf of the Certified Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

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Plaintiffs,

vs.

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Defendants.

CASE NO. 30-2023-01336866-CU-OE-CXC
Assigned to: Hon. Melissa R. McCormick

CLASS ACTION
Complaint Filed: July 7, 2023
FAC Filed: August 15, 2023
SAC Filed: December 7, 2023

DECLARATION OF CHARLES DAVIS IN SUPPORT OF PLAINTIFF'S NOTICE OF MOTION AND UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

DATE:
TIME: A.M.
PLACE: Dept. CX104

Docusign Envelope ID: 17A95309-044C-4C94-B575-EBA9240A16E4

I, Charles Davis, declare and state as follows:

1. I am over the age of 18 and competent to testify about the matters set forth in this declaration. I have personal knowledge of the facts set forth in this declaration. I am a named plaintiff in this case.

2. My statements in this declaration concern the period of time I worked selling solar products for the Defendant. I worked for the Defendant from about * to *.

3. During the time I worked for the Defendant, I was not paid as an employee, but an independent contractor. I was barely making enough to survive. Once when I had to take a day off to apply for food stamps, my supervisor mocked me to "stop being poor." Since I was reliant on the company-provided housing and the work did not pay enough to live, I had to leave the job and move back to *Indiana.

4. I understand that in July 2024 the parties mediated and agreed to a settlement in this matter during which I provided information about my experiences and those of my fellow class members on behalf of the class.

5. I have always striven to look out for the class's best interest and have discharged my duties as class representative to the best of my ability.

6. For instance, I have assisted Class Counsel at every stage of this proceeding. I have been informed of and considered my duties as a class representative, and since the beginning I have been motivated to seek a resolution of these claims which is fair to all the other persons affected. I found out that one of my co-workers, Parker Crawley, was working with an attorney to pursue claims against Defendant for how they were paying us, and I wanted to be involved to support the case and make sure it worked out appropriately. I spoke with attorney Thomas Solmer several times over a period of time before the Complaint was filed, discussing everything about my experience and how Defendant operated, and I reviewed the Complaint and provided my feedback on it. I continued to speak with counsel about the facts as more information was gathered, and the case proceeded to mediation. I reviewed and scrutinized the settlement agreement and have remained in close contact with Class Counsel regarding further steps to be taken in this process.

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7. I understand that as a class representative, I will continue to have significant involvement in the case. I estimate that, from the time I started working with my attorneys to the present day, I have devoted in excess of 15 hours of my time attempting to work with my attorneys and to ensure that the case would move forward to the best of my ability.

8. I understand that because I am to receive an enhancement payment, I am entering into a comprehensive release of *all claims, known and unknown*, unlike the rest of the Class Members, who are releasing only those claims that were or could have been litigated based on the facts alleged in the operative Complaint.

9. Also, due to my fee agreement with Class Counsel, I understand that I would have been obligated to pay for all costs arising out of the litigation; if the case had not resolved in our favor. These costs could have been substantial for someone making a modest living, and my agreement to take on these costs put me at great financial risk.

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

Executed on 2/25/2025 at Portage Indiana.
(city and state)

DocuSigned by:
06A07175D8964F9...

Charles Davis