

TURNER DHILLON LLP

William M. Turner (State Bar No. 199526)
wturner@turnerdhillon.com
Asha Dhillon (State Bar No. 205461)
adhillon@turnerdhillon.com
Samer N. Aref (State Bar No. 336747)
saref@turnerdhillon.com
707 Wilshire Boulevard, Suite 3250
Los Angeles, California 90017
Telephone: (213) 373-5502
Facsimile: (213) 373-5599

Attorneys for Plaintiff David Madden

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

DAVID MADDEN,

Plaintiff,

v.

PATRIOT GROWTH INSURANCE
SECIVICES, LLC, *et al.*,

Defendants.

Case No. 23STCV26753

**DECLARATION OF DAVID MADDEN IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Judge: Hon. Carolyn B. Kuhl
Department: SSC-12
Date: January 28, 2026
Time: 10:30 a.m.

Complaint filed: October 31, 2023
Trial date: Not set

I, David Madden, declare that:

1. I am the named Plaintiff in the above captioned matter. I have personal knowledge of the facts stated herein, and could and would testify competently thereto if sworn as a witness.

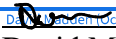
2. I made myself available during the entirety of the mediation and was critical in bringing about the Settlement Agreement. This class action would not have been possible without me, and I invested my own time and effort, and placed myself at risk for the sake of the class members.

///

///

1 Moreover, because my name and personal allegations are memorialized in the pleadings in the action,
2 I have exposed myself to potential liability for costs and industry/employer blacklisting.

3 I declare under penalty of perjury under the laws of the state of California that the
4 foregoing is true and correct. Executed on Oct 23, 2025.

5
6 
David Madden (Oct 23, 2025 16:33:56 PDT)
7 David Madden

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 707 Wilshire Boulevard, Suite 3250, Los Angeles, California 90017-5759.

**DECLARATION OF DAVID MADDEN IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**

☒ I caused the documents to be **E-served** through **Case Anywhere** by electronically mailing a true and correct copy through **Case Anywhere** pursuant to Court Order through the electronic mail system to the email address(es) set forth below per Court Order. The file transmission was reported as completed and a copy of the **Case Anywhere** Transaction Receipt page will be maintained with the document(s) in our office.

OGLETREE DEAKINS
David A. Garcia, Esq.
Nicole A. Naleway, Esq.
695 Town Center Drive, Suite 1500
Costa Mesa, CA 92626
Telephone: (714) 800-7900
Facsimile: (714) 754-1298
David.garcia@ogletree.com
Nicole.naleway@ogletreedeadkins.com

I declare under penalty of perjury that the foregoing is true and correct.
Executed on October 24, 2025, at Los Angeles, California.


AMANDA RUIZ