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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO

DOMINIC DULANEY, individually, and on
behalf of the State of California and other
aggrieved persons,

Plaintiff,

v.

KQED, INC., a California corporation; and
DOES 1 through 10, inclusive,

Defendants.

DOMINIC DULANEY, individually, and on
behalf of all others similarly situated,

Plaintiff,

v.

KQED, INC., a California corporation; and
DOES 1 through 10, inclusive,

Defendants.

Lead Case No. CGC-24-611614
Consolidated with Case No. CGC-24-612506

*[Assigned for All Purposes to the Hon. Ethan
P. Schulman, Dept. 304]*

**DECLARATION OF DOMINIC
DULANEY IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Action Filed: January 11, 2024

DECLARATION OF DOMINIC DULANEY

I, Dominic Dulaney, hereby 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 KQED, Inc. ("KQED") as an hourly-paid non-exempt employee from approximately May 2018 to approximately November 2022. I worked for KQED as a clerk. My job duties included, but were not limited to, shipping and receiving in the mail room and loading dock, stocking the supply closets and refrigerators, moving furniture, and placing orders.

3. Based on my experience and knowledge of KQED's wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on behalf of myself as well as other hourly-paid non-exempt employees of KQED.

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 KQED. I believe we were all subject to the same employment policies and practices while working for KQED.

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

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 KQED's 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 KQED.

7. I have always kept the best interests of the other hourly-paid non-exempt employees in mind while performing my duties as the 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 regular contact with my attorneys regarding the status of the case, meeting with my attorneys regarding the claims, making myself available the day of mediation to answer questions, and reviewing the settlement agreement to make sure it was fair.

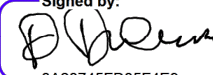
8. I will continue to actively participate in this lawsuit as necessary and will continue to make myself available to assist in this case moving forward as needed.

9. I do not have any actual or potential conflicts of interest with Class Members or the proposed Settlement Administrator, ILYM Group Inc.

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

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

Executed on 12/19/2025, at Antioch, California.

Signed by:

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Dominic Dulaney