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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

STEVEN ERICSON and CHRISTOPHER LOPEZ, individually, and on behalf of the State of California and other aggrieved persons,

Plaintiffs,

v.

TGH EMPLOYEES LLC, a Nevada limited liability company; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 37-2024-00001694-CU-OE-CTL

PAGA REPRESENTATIVE ACTION

ASSIGNED FOR ALL PURPOSES TO:
Hon. Judy Bae, Dept. C-62

DECLARATION OF PLAINTIFF STEVEN ERICSON IN SUPPORT OF PLAINTIFFS' MOTION FOR APPROVAL OF PAGA SETTLEMENT

PAGA APPROVAL HEARING
DATE: March 30, 2027
TIME: 9:10 a.m.
DEPT.: C-62

Complaint Filed: January 11, 2024

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DECLARATION OF STEVEN ERICSON

I, Steven Ericson, 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 Plaintiff's Motion for Approval of PAGA Settlement.

2. I have worked for Defendant TGH Employees LLC ("Defendant") as an hourly-paid, non-exempt employee from approximately May 2022 to December 2022.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

3. When I decided to become involved in this lawsuit as a private attorney general for the State of California, I understood that I was not only seeking civil penalties on behalf of myself and the State of California, but also for other aggrieved employees who worked for Defendant.

4. I was also made aware that being a private attorney general in an action filed on behalf of others would subject me to a stigma that is sometimes associated with those who bring these kinds of lawsuits. I was aware that, acting as a private attorney general, I might be responsible for some or all of Defendant's legal costs if the case was not successfully concluded. Even with knowledge of these risks, I was willing to go forward and to act on behalf of the other employees and the State of California, but I was nervous about losing and having a judgment filed against me for costs or losing job opportunities in the future.

5. I understood that there were risks involved in representative action lawsuits. I understood that the lawsuit could continue for several years and require my services and attention throughout the entire length of the lawsuit. I learned that even if I won at trial, the case could be further delayed by appeals.

Notoriety and Personal Difficulties Encountered

6. As the named plaintiff, I am the face of the litigation. Additionally, a settlement letter will be mailed to approximately 146 current and former employees of Defendant. The settlement letter informs all of these employees that I filed a representative action against Defendant. Exposing myself to this kind of publicity creates a risk for my future career prospects,

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since current and former employees of Defendant may move to different companies within the industry or may know people at other companies within the industry who may not want to hire someone who sued an employer.

Amount of Time and Effort Spent and Duration of the Litigation

7. I have spent a substantial amount of time and effort on this litigation. My work on this case has included, among other things, gathering and providing my employment records, discussing my experiences working for Defendant, and participating in settlement discussions. I estimate that since I retained my counsel, I have spent approximately 35 hours on the activities described above.

Personal Benefit Received as a Result of the Litigation

8. Absent the requested service payment, the personal benefit I will receive is the same as all other employees. But unlike the other employees, I have signed a general release of Defendant. The other employees are only releasing their claim for civil penalties under PAGA as asserted in the lawsuit.

9. I have no actual or potential conflict of interest with the Aggrieved Employees in this PAGA Action or with the Settlement Administrator that the Parties agreed to appoint, ILYM Group, Inc.

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

Executed on 8/18/2026, at San Diego, California.

DocuSigned by:

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Steven Ericson