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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

QUIANA BOYETTE, individually, and on behalf
of all others similarly situated;

Plaintiffs,

vs.

INCLUSION SPECIALIZED PROGRAMS LLC,
a limited liability company; and DOES 1 through
10, inclusive,

Defendants.

DESIREE SAENZ, on behalf of herself and all
other similarly situated employees, and on behalf
of the general public;

Plaintiffs,

vs.

INCLUSION SPECIALIZED PROGRAMS,
LLC, a California Limited Liability Company,
DOES 1 through 10, inclusive,

Defendants.

Case No. 23STCV29286
[Related Case No. 24STCV05482]

*[Assigned to: The Hon. William F
Highberger, Dept. 10]*

CLASS & PAGA ACTION

**DECLARATION OF GIANCARLO
RECINOS IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

FINAL APPROVAL HEARING

Date: August 14, 2026
Time: 10:00 a.m.
Dept.: 10

Roman Otkupman, CSBN 249423
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Nidah Farishta, CSBN 312360
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OTKUPMAN LAW FIRM, A LAW CORPORATION

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Attorneys for Plaintiffs, Desiree Saenz

1 I, Giancarlo Recinos, declare as follows:

2 1. I am admitted and in good standing to practice as an attorney in the State of
3 California. I am an Senior Attorney at Wilshire Law Firm, PLC (“WLF”), counsel of record for
4 plaintiffs Quiana Boyette and Desiree Saenz (collectively the “Plaintiffs” or “Class
5 Representatives”).

6 2. Wilshire Law Firm and Otkupman Law Firm have a fee splitting agreement. The
7 fees shall be split as follows: 50% to Wilshire Law Firm and 50% to Otkupman Law Firm. Pursuant
8 to California Rules of Professional Conduct, rule 1.5.1, Plaintiffs were made aware of the fee
9 splitting agreement in advance and gave written consent.

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

12 Executed on August 18, 2026, in Santa Rosa, California.

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14 /s/ Giancarlo Recinos
15 Giancarlo Recinos
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