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Attorneys for Plaintiff RUBY PELAYO
and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

RUBY PELAYO, an individual, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

HONEYWELL SAFETY PRODUCTS USA,
INC., a Delaware corporation, and DOES 1
through 50,

Defendants

) **Case No.: 37-2023-00055510-CU-OE-**
) **CTL**

) **DECLARATION OF IAN PANCER IN**
) **SUPPORT OF PLAINTIFF'S**
) **UNOPPOSED MOTION FOR**
) **PRELIMINARY APPROVAL OF**
) **CLASS AND REPRESENTATIVE**
) **ACTION SETTLEMENT**

) Hearing Information:

) Date: April 24, 2026

) Time: 1:30 p.m.

) Dept.: C-63

) Hon. Katherine A. Bacal

) Action Filed: December 22, 2023

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1. I am the counsel of record for the named Plaintiff, the putative Class, and a quasi-attorney general for the State of California and Aggrieved Employees as their designated proxy pursuant to the Private Attorney General Act (PAGA). As such, I am fully familiar with the facts, pleadings, and history of this matter. The following facts are within my own personal knowledge, and if called as a witness, I could testify competently to the matters stated herein.

2. This declaration is submitted in support of Plaintiffs' Motion for Preliminary Court

3. I am experienced in wage and hour class action litigation.

4. I became a member of the State Bar of California in December 2006.

5. I focus my practice on prosecuting employment law claims on behalf of employee-

7. I have personally represented hundreds of plaintiffs in individual employment cases and over 100,000 (one hundred thousand) class members in class actions.

8. I have been participating in, and approved as, class counsel, on class and representative cases since 2016 (earliest case filing date). I have been lead or co-lead counsel in more than 15 (fifteen) representative action cases – i.e., putative class action or PAGA cases. Of these cases, some have resulted in court approved settlements, some are ongoing, and some resolved on an individual basis. I have been appointed as class counsel in the following class action cases:

• *Don v. Penn, et al.*, San Diego County Superior Court case number 37-2016-00025005-CU-OE-CTL. (filed 2016)

• *Aniezue v. The Sherwin-Williams Company, et al.*, San Diego Superior Court case number 37-2020-00025415-CU-OE-CTL. (filed 2020)

- *Spurlock v. Perry Motors of National City, LLC, et al.*, San Diego County Superior Court case no. 37-2020-00007493-CU-OE-CTL. (filed 2020)
- *Smith v. DI Logistics, LLC, et al.* San Bernadino County Superior Court case no. CIVDS 2011469 (filed 2020)
- *Craft v. UAG Escondido MI, Inc., et al.*, San Diego County Superior Court case number 37-2021-00000982-CU-OE-CTL. (filed 2021)
- *Povarnitson v. Electronic Control Systems, LLC* San Diego County Superior Court case number 37-2021-00043575-CU-OE-CTL (filed 2021)

9. My office has devoted time and resources in identifying and investigating potential claims in this action, reviewed and analyzed hundreds of pages of documents and data, taken multiple sets of discovery, and taken HSP's deposition.

10. I believe the average recovery for the Settlement Class is very good in view of the facts of the case and particularly given the risks inherent in further litigation. The settlement is favorable given that members of the Settlement Class will be promptly compensated, rather than face uncertainties inherent in further litigation and waiting for years of litigation to ensue. Based on all considerations, I believe this settlement is highly favorable, fundamentally fair, adequate, and a reasonable resolution of disputed issues and is in the best interests of the Settlement Class.

Except as to those matters stated on information and belief, I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed March 27, 2026, at San Diego, California

/s/Ian Pancer

Declarant