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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SACRAMENTO

NATALIA TAN, as an individual and on behalf of all others similarly situated, and as a private attorney general, Plaintiff, vs. ASURION INSURANCE SERVICES, INC., a Tennessee corporation; and DOES 1 through 50, inclusive, Defendants.	Case No. 24CV000032 [Hon. Jill H. Talley, Department 8A] **DECLARATION OF NATALIA TAN IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF PAGA SETTLEMENT** Date: November 20, 2026 Time: 9:00 a.m. Department: 8A Complaint Filed: January 2, 2024 **Reservation ID: #A-00032-001**

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I, Natalia Tan, declare as follows:

1. I am an individual over the age of 18. I am the named plaintiff in the above-reference action. I have personal knowledge of the facts set forth below, except as to those matters stated on information and belief and, as to those matters, I believe them to be true. If called as a witness, I could testify competently as to the matters stated in this declaration.

2. In July of 2023, I began working for Assurance Insurance Services, Inc. as a Field Technician. Until my employment ended in November of 2023, I was paid on an hourly basis as a non-exempt employee. I was not paid for all hours actually worked and also was not reimbursed for all mileage expenses incurred in connection with my employment. Specifically, I was not paid wages for the time incurred driving home after my last customer visit of the workday. Nor was I reimbursed for mileage incurred driving home after my last customer visit of the workday. Moreover, when I worked more than 5.0 hours in a workday, I regularly was not provided lawful meal periods. I also was regularly not provided an additional hour of regular rate wages for a missed, late, or interrupted meal periods. As a result of each of these issues, I was not timely paid all due wages during employment or upon separation of employment and also was not provided with accurate itemized wage statements.

3. I understand that this action is being prosecuted on behalf of the State of California and that I am acting as a private attorney general. I have taken all necessary steps to represent the interests of the State, including by providing information and documents to my counsel, discussing the claims and lawsuit with my counsel, answering any questions that have come up (including about how I was paid or what my wage statements show or meant), participating in the discovery process, and preparing for and appearing for deposition. I also made myself available to participate in a mediation. During the more than 30 months that this lawsuit (and related arbitration) have been pending, I have easily spent at least 2.0 hours per month, on average—or more than 60.0 hours total—in progressing the claims.

4. I understand that I am responsible to the State with respect to trying the case, appearing in court, and working with my counsel. I remain willing to devote my time to this lawsuit for the benefit of the State. I do not believe I have any interests that are adverse to the interests of the State. I also am unaware of any such issues having been raised or presented by anyone else.

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5. I believe many employees would not sue their employer out of fear. I took on risks by bringing this lawsuit, and I understand that the State and others will benefit because of the actions that I have taken. I feel that it is a positive accomplishment, am proud of the result, and believe that the settlement is fair, adequate, and reasonable.

6. I am informed and believe that there are other individual claims that I could have pursued against the company. Nonetheless, I am executing a general release of any and all claims, including a waiver of any rights I have under Civil Code section 1542. I understand the proposed settlement does not require similar releases of any other employees.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this NVT day of September 2026, at West Sacramento, California.

Signed by:
34529233CF1C41B...

Natalia Tan