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5 Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF RIVERSIDE

10 JONATHAN NAVA, individually, on a
11 representative basis, and on behalf of all
12 others similarly situated;

13 Plaintiff,

14 vs.

15 TEMECULA VALLEY DRYWALL, INC.
a California Corporation; LORRY HALES,
an individual; DOUGLAS MISEMER, an
16 individual; and DOES 1 through 20,
inclusive;

17 Defendants.
18

Case No.: CVRI2400423

*[Assigned to Hon. Harold Hopp, Dept 1, for all
purposes]*

DECLARATION SANDY VILLELLA

Hearing

Date: February 5, 2025

Time: 8:30 a.m.

Dept.: 1

Complaint filed: January 25, 2024

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1. I am employed as the Controller by Defendant Temecula Valley Drywall, Inc. (“TVDI”) at its office in Murietta, California, I have held this position since August 2006. I have personal knowledge of the facts set forth herein and if called upon to testify about the following matters, I would and could competently do so.

3. During 2020 to present, TVDI has employed around 80 hourly-paid employees on a regular basis. Most of these hourly-paid employees can read and understand English and are required to do so as part of their job duties. Approximately five are Spanish speakers and read Spanish only. To the best of my knowledge most of TVDI's hourly-paid employees attended school in the United States and have a high school degree or its equivalent. Some of the Spanish speakers attended school in Mexico.

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

[Signature]

Sandy Villella