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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

MIKAIL DYTANIEL CROSBY, individually,
on behalf of all others similarly situated, and on
behalf of the State of California and other
aggrieved persons,

Plaintiff,

v.

FENCE SPECIALTIES, LLC, a California
limited liability company; FENCE
SPECIALTIES INC., an unknown entity; and
DOES 1 through 10, inclusive,

Defendants.

Case No.: 37-2023-00055194-CU-OE-CTL

*[Assigned for All Purposes to the Hon. Loren
G. Freestone, Dept. C-64]*

**DECLARATION OF MIKAIL DYTANIEL
CROSBY IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Preliminary Approval Hearing:

Date: May 1, 2026

Time: 10:30 a.m.

Dept: C-64

Action Filed: December 21, 2023

DECLARATION OF MIKAIL DYTANIEL CROSBY

I, Mikail Dytaniel Crosby, 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 my Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for Defendant Fence Specialties, LLC FKA Fence Specialties, Inc. (“Fence Specialties”) as an hourly-paid non-exempt employee from approximately October 2023 to approximately November 2023.

3. Based on my experience and knowledge of Fence Specialties’ wage-and-hour policies and my familiarity with their employment practices, I worked with my attorneys to bring claims on behalf of myself and other hourly-paid non-exempt employees of Fence Specialties.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to those of other hourly-paid non-exempt employees of Fence Specialties based on my experience working for Fence Specialties. I believe we were all subject to the same employment policies and practices.

5. I do not have any conflicts with other hourly-paid non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid non-exempt employees at Fence Specialties.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by Fence Specialties’ company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by Fence Specialties.

7. I have always kept the best interests of the other hourly-paid non-exempt employees in mind while performing my duties as a named plaintiff in this case. I have been committed throughout the course of this case to prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the other

hourly-paid non-exempt employees by initiating this lawsuit, providing information to my attorneys, keeping in contact with my attorneys regarding the status of the case, meeting with my attorneys in advance of mediation, and reviewing the settlement agreement to make sure it was fair.

8. I will continue to actively participate in this lawsuit as necessary and will continue to make myself available to assist in this case moving forward as needed.

9. I do not have any actual or potential conflicts of interest with Class Members or the proposed Administrator, ILYM Group Inc.

10. I am not aware of any other pending matter or action against Defendant asserting claims that will be extinguished or adversely affected by this Settlement.

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 3/26/2026, at Oceanside, California.

DocuSigned by:

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 Mikail Dytaniel Crosby