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*Attorneys for Plaintiff TYLER EMERY, individually,  
and on behalf of others similarly situated*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SANTA CRUZ**

TYLER EMERY, individually, and on behalf of  
others similarly situated,

Plaintiff,

vs.

SANTA CRUZ BICYCLES, LLC; and DOES 1  
through 25, inclusive,

Defendants.

Case No.: 24CV00244  
Related Case No. 24CV00839

*Assigned for all purposes to the Honorable  
Syda K. Cogliati, Dept. 5*

**DECLARATION OF PLAINTIFF TYLER  
EMERY IN SUPPORT OF MOTION FOR  
FINAL APPROVAL OF CLASS  
ACTION AND PAGA SETTLEMENT,  
ATTORNEYS' FEES AND COSTS, CLASS  
REPRESENTATIVE INCENTIVE  
PAYMENT, AND SETTLEMENT  
ADMINISTRATION COSTS**

Date: March 3, 2025  
Time: 8:30 a.m.  
Dept.: 5

Complaint Filed: January 25, 2024  
Trial Date: Not Set

[illegible]

1. I am over the age of eighteen (18) and a resident of the State of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.
2. I was employed by Defendant Santa Cruz Bicycles (“Santa Cruz Bicycles”) as an hourly-paid, non-exempt Shipper from approximately August 2017 to approximately May 2023.
3. Because I thought the practices at Santa Cruz Bicycles may not be lawful, I decided to seek legal advice about my work experiences at Santa Cruz Bicycles and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits under the Private Attorneys General Act (“PAGA”), and what it meant to bring a class and PAGA action so that I understood what I was considering doing.
4. I have regularly conferred with my attorneys regarding the case as part of my responsibilities as a class and PAGA representative. This process included searching for and providing documents concerning my employment with Santa Cruz Bicycles, answering any questions my attorneys had about the documents, providing information regarding the company’s practices and the duties of other non-exempt employees, and helping my attorneys develop a strategy as to what additional documents and information they could seek to obtain from Santa Cruz Bicycles.
5. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained. I made myself available to answer any questions my attorneys had about Santa Cruz Bicycles’ practices and treatment of its employees whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could.
6. I understood that in the event this matter did not settle and proceeded to trial, I would need to respond to discovery, attend deposition(s), help my counsel in any way they requested, and be in court to participate in the trial. I was ready to perform that role, as well as fulfill any other

1 responsibilities that are necessary for this lawsuit.

2       7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several  
3 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I  
4 also understood there was a risk of losing any current job and/or income due to the time that I would  
5 have to spend fulfilling my responsibilities in this matter, including having to attend a deposition and  
6 trial, if needed. Most importantly, I believe that by pursuing this case, I have taken a significant risk  
7 because future employers can easily find out that I sued my prior employer, and that may negatively  
8 impact my ability to find employment within this industry – and even outside of it – in the future. In  
9 contrast, the other employees who will be receiving money from this lawsuit did not have to file a  
10 claim or take the risk that I took in bringing this action.

11       8. I reviewed the settlement agreement, discussed the settlement agreement with my  
12 attorneys, and asked them questions before signing it.

13       9. I believe that I have done everything that my attorneys have asked of me and tried, to  
14 the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California.  
15 In total, I have spent approximately 30 to 35 hours participating in this case as described above. I  
16 believe my efforts helped get the result obtained in this case.

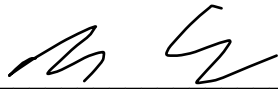
17       10. I understand that any resolution of this lawsuit on a class wide basis is subject to court  
18 approval, and any settlement must be determined to be in the best interest of the Class as a whole. At  
19 all times throughout the course of this litigation I have considered the interests of the Class and put  
20 them before my own personal interests.

21       11. I understand that incentive or enhancement awards are discretionary and intended to  
22 compensate named plaintiffs for the quality and quantity of the work done on behalf of the class and  
23 other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA  
24 action, and an acknowledgment of the benefits resulting from the representative's actions. I believe  
25 my work in this matter is meritorious on these points for the reasons set forth above.

26       12. I respectfully request that the Court approve and award me a Class Representative  
27 Incentive Payment in the amount of \$7,500.00 for my efforts and active participation in the case and  
28 for the broader, general release of all claims that I have or may have against Santa Cruz Bicycles in

1 connection with the settlement. Taking into consideration the time that I dedicated to this case, I  
2 believe that this amount is reasonable.

3  
4 I declare under penalty of perjury under the laws of the State of California that the foregoing  
5 is true and correct. Executed on 02/05/2025, at Santa Cruz, California.

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