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9 Attorneys for Plaintiff,
10 DONNA JONES

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF SACRAMENTO**

13 DONNA JONES, on behalf of herself, the State
14 of California, and other aggrieved employees,

15 Plaintiff,

16 vs.

17 CAVU EXPERIENCES (AMER) LLC; and
18 DOES 1-100, Inclusive,

19 Defendants.

Case No. 24CV000624

DECLARATION OF BARUCH KREIMAN
RE: COMPLIANCE WITH LOCAL RULE
2.99.05

[Filed Concurrently with:

1. *Notice of Motion and Motion*
2. *Memorandum of Points and Authorities*
3. *Declaration of Baruch Kreiman*
4. *Declaration of Donna Jones*
5. *[Proposed] Order*

Date: September 11, 2026
Time: 9:00 AM
Res ID: A-00624-001
Dept: 23
Assigned to: Hon. Jill H. Talley

Complaint Filed: January 16, 2024
Trial Date: None Set

20 I, Baruch Kreiman, declare as follows:

- 21 1. I am an attorney at law licensed to practice before all courts of the State of California
22 and am a senior associate at Abramson Labor Group, counsel of record for Plaintiff
23 Donna Jones in this action. I have personal knowledge of the facts set forth herein and,
24 if called as a witness, could and would testify competently thereto.
25

26 DECLARATION OF BARUCH KREIMAN RE: COMPLIANCE WITH LOCAL RULE

2. I have reviewed the Sacramento Superior Court Class Action/PAGA Settlement Checklist (revised January 2024) posted on the Court's website, as required by Local Rule 2.99.05.

3. The accompanying Motion for Approval of Private Attorneys General Act Settlement, Memorandum of Points and Authorities, and supporting declarations have been prepared in compliance with the Checklist. Specifically, the Memorandum of Points and Authorities is organized to correspond directly with the applicable items listed in the Checklist to facilitate the Court's review.

4. The Proposed Order submitted herewith also complies with the Checklist requirements, including the provision for a Settlement Compliance Hearing and the retention of jurisdiction rather than dismissal.

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

Executed at Burbank, California.

DATED: April 6, 2026

By: Baruch Kreiman

Baruch Kreiman, Esq.
Attorney for Plaintiff
Abramson Labor Group