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10 Attorneys for Plaintiffs Seth Taylor, Leonardo Ramirez,
11 and Jake Musick, on behalf of themselves and
12 all “aggrieved employees” pursuant to
13 Labor Code § 2698 *et seq.*

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SOLANO

12 SETH TAYLOR, LEONARDO RAMIREZ,
13 and JAKE MUSICK, on behalf of themselves
14 and all “aggrieved employees” pursuant to
15 Labor Code § 2698 *et seq.*,

16 Plaintiffs,

17 v.

18 A PLUS TREE, LLC, a California limited
19 liability company, and DOES 1 through 10,
20 inclusive,

21 Defendants.

Case No. CU24-03172

Assigned to the Hon. Stephen Gizzi, Dept. 3

DECLARATION OF SERVICE

Date: September 23, 2025

Time: 9:00 a.m.

Dept.: 3

Complaint Filed: April 26, 2024

1 I am employed in Ventura County, State of California. I am over the age of eighteen
2 years and not a party to the within action. My business address is 4550 East Thousand Oaks
3 Boulevard, Suite 100, Westlake Village, CA 91362.

4 On August 15, 2025, I served the foregoing documents described as:

5 1. NOTICE OF UNOPPOSED MOTION AND MOTION FOR AN ORDER
6 APPROVING SETTLEMENT OF CLAIMS BROUGHT PURSUANT TO THE PRIVATE
7 ATTORNEYS GENERAL ACT OF 2004, AWARDING ATTORNEYS' FEES, COSTS, AND
8 REIMBURSEMENT OF SETTLEMENT ADMINISTRATION EXPENSES, AND
9 DISMISSING ACTION WITH PREJUDICE; MEMORANDUM OF POINTS AND
10 AUTHORITIES;

11 2. DECLARATION OF EVAN S. GAINES IN SUPPORT OF UNOPPOSED
12 MOTION FOR AN ORDER APPROVING SETTLEMENT OF CLAIMS BROUGHT
13 PURSUANT TO THE PRIVATE ATTORNEYS GENERAL ACT OF 2004, AWARDING
14 ATTORNEYS' FEES, COSTS, AND REIMBURSEMENT OF SETTLEMENT
15 ADMINISTRATION EXPENSES, AND DISMISSING ACTION WITH PREJUDICE;

16 3. DECLARATION OF LISA MULLINS ON BEHALF OF ILYM GROUP, INC.
17 IN SUPPORT OF PLAINTIFF'S UNOPPOSED MOTION FOR AN ORDER APPROVING
18 SETTLEMENT OF CLAIMS BROUGHT PURSUANT TO THE PRIVATE ATTORNEYS
19 GENERAL ACT OF 2004, AWARDING ATTORNEYS' FEES, COSTS, AND
20 REIMBURSEMENT OF SETTLEMENT ADMINISTRATION EXPENSES, AND
21 DISMISSING ACTION WITH PREJUDICE;

22 4. [PROPOSED] ORDER APPROVING SETTLEMENT OF CLAIMS
23 BROUGHT PURSUANT TO THE PRIVATE ATTORNEYS GENERAL ACT OF 2004,
24 AWARDING ATTORNEYS' FEES, COSTS, AND REIMBURSEMENT OF SETTLEMENT
25 ADMINISTRATION EXPENSES, AND DISMISSING ACTION WITH PREJUDICE; and

26 5. DECLARATION OF SERVICE

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1 On the interested parties in this action as follows:

2 Michael A. Wahlander, Esq. – mwahlander@vedderprice.com
3 Heather Domingo, Esq. - hdomingo@vedderprice.com
4 VEDDER PRICE (CA), LLP
1 Post Street, Suite 2400
San Francisco, CA 94104

5 On the above date:

6 (BY ELECTRONIC SERVICE) The above-stated document was submitted for service by
7 electronic email transmission on the counsel of record listed above.

8 On August 15, 2025, the above-stated documents were uploaded to the LWDA web portal:

9 Labor & Workforce Development Agency
10 (Service via Online Submission to www.dir.ca.gov)

11 (UPLOADED TO LWDA WEB PORTAL) I caused the above-described documents to be
12 delivered to the Labor & Workforce Development Agency via online process at the PAGA Filing
13 website (www.dir.ca.gov) in accordance with the procedure imposed by the LWDA.

14 I declare under penalty of perjury that the foregoing is true and correct.

15 Executed on August 15, 2025, at Westlake Village, California.

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18 EVAN S. GAINES