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XPDEL, INC.
8

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF ALAMEDA**

11 ARTHUR QUESADA, as an individual
and on behalf of all others similarly
12 situated,

13 Plaintiff,

14 v.

15 XPDEL, INC., a California Corporation;
16 and DOES 1-100, inclusive,

17 Defendants.
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Case No. 23CV031688

**DEFENDANT XPDEL, INC.'S
DECLARATION OF ANDREW LAREW IN
SUPPORT OF NEED ON FUNDING OF THE
SETTLEMENT**

Complaint filed: April 21, 2023

Assigned to: Judge Brad Seligman Dept. 23

1 I, Andrew Larew, declare as follows:

2 1. I am the Chief Financial Officer of XPDEL, Inc. ("XPDEL"), the named defendant in
3 the above-captioned action. In my capacity as the Chief Financial Officer, I oversee all financial
4 operations of the company, and am responsible for strategic financial planning, managing cash flow,
5 and monitoring the company's financial health, among other responsibilities. The facts stated herein are
6 true of my own knowledge and if called as a witness, I would and could testify competently to these
7 facts.

8 2. I understand that a settlement has been reached in this action in the amount of \$175,000.
9 XPDEL is a California based logistics company that used to have operations in the San Francisco Bay
10 Area that were closed among other cities due to COVID-19 related severe business impact. Separating
11 the settlement payment into two payments over the course of a fiscal year is necessary for the financial
12 health of the company. Due to loss of clients to COVID-19, and continued increasing costs of doing
13 business, including recent wage increases and meeting new legal requirements, dividing and spreading
14 out the settlement payment will allow XPDEL to continue to fund its remaining operations while
15 minimizing disruptions during critical business peak periods.

16 I declare under penalty of perjury under the laws of the State of California that the foregoing is
17 true and correct. Executed on August 26, 2024 at 3:50pm CST.

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19 Dated: August 26, 2024.

Andrew Larew

20 Andrew Larew
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