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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

JULIA GONZALES, ERIKA BRITO and JESUS RODRIGUEZ, on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

PMC SOUTHWEST LLC, a limited liability company; THE ARCTICOM GROUP, LLC, a limited liability company; THE ARCTICOM GROUP REFRIGERATION, LLC, a limited liability company and DOES 1 through 50, inclusive,

Defendants.

CASE NO. CIVSB2409006

Assigned for all purposes to:
Hon. Winston Keh, Dept. S37

DECLARATION OF JESUS RODRIGUEZ IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Date: December 11, 2026
Time: 8:30 a.m.
Dept: S37

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DECLARATION OF JESUS RODRIGUEZ

I, JESUS RODRIGUEZ, declare as follows:

1. I am over the age of eighteen and am a Class Representative Plaintiff in the above-referenced matter. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto.

2. I submit this declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement.

3. In 2023, I was employed as a non-exempt employee by Defendants. During my time working for Defendants, I was subjected to the same wage and hour policies and practices that are at issue in this case, including the Defendants' practice of failing to pay employees all wages owed, failing to provide meal periods, failing to authorize and permit rest periods, failing to provide accurate wage statements, failing to reimburse myself and other hourly employees for work expenses, and related issues.

4. Since the beginning of this case, I have been closely involved in assisting my attorneys with prosecuting this action and have done so diligently and aggressively since I filed the Complaint. Prior to getting involved in this case, I spoke with my attorneys for many hours to understand the nature of the case and shared with my attorneys the wage and hour violations that I experienced working for Defendants. Before becoming involved in the case, I also spent several hours acquainting myself with my duties and obligations as a class action and PAGA representative, and my role in prosecuting this case against Defendants.

5. After I became involved in this case, I assisted my attorneys in reviewing and understanding the numerous documents exchanged during informal discovery. I reviewed many of Defendants' policy documents with my attorneys and answered my attorneys' questions relating to those documents.

6. In August 2025, the parties attended Mediation, and I worked with my attorneys to prepare for the Mediation. I was on-call during the mediation, and I monitored the mediation proceedings and discussed the result of the Mediation with my attorneys after its conclusion.

7. Since the date of the Mediation, I have communicated with my attorneys regarding the

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settlement terms, and spent many hours reviewing the lengthy settlement agreement, and ensuring that the settlement agreement is fair to all class members. After the initial approval, I have also discussed the proceedings with my attorneys, to ensure that the settlement administration process was fair to all of the employees affected by the settlement.

8. As detailed above, I actively participated in all stages of litigation and have been continuously apprised of all aspects of this case. I believe that if not for my efforts and persistence in this case, that the class members would have benefitted far less without my involvement. I am an adequate representative of the hourly employees. My interests are the same as the other non-exempt employees, as Defendants uniformly failed to pay employees all wages owed, failed to provide meal periods, failed to authorize and permit rest periods, failed to provide accurate wage statements, and failed to reimburse myself and other hourly employees for work expenses, and other related issues. I received the same uniform pay stubs as every other hourly non-exempt employee, and I believe that there are other aspects with the paystubs that are confusing and make it difficult to accurately confirm if the employees are paid correctly.

9. I have been diligent, and I believe I acted above and beyond that which was expected of me as a Class Representative throughout all stages of the litigation, up to and including the settlement of this Class Action. I have no claim that was antagonistic to the class. I accepted the potential risk of being liable for the opposing parties' costs if we were unsuccessful in this lawsuit. I have accepted the stigma of being a class representative in a class action labor dispute which could affect my future employment with Defendants, along with my future employability.

10. I believe that the Class Action settlement in the gross amount of $931,140 obtained on behalf of the class is excellent in view of the complex and varied issues involved with the case. I took into consideration the strengths and weaknesses of the various claims for all employees and along with my attorneys agreed to the settlement. I was prepared to sit for trial, if necessary. I strongly support the settlement in this matter. When I was contemplating settlement, I always kept the best interests of the class and the aggrieved employees in mind over my own and I was not willing to settle the matter until I felt it was in the best interest of all class members and aggrieved employees.

11. In addition to performing work on this matter, I assumed a substantial risk in serving as a class representative if the Defendants prevailed in this case. My willingness to assume the financial risk

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was and is significant. Although I was confident in the merits of this lawsuit, I do not have any substantial savings and bringing this lawsuit was a serious commitment on my behalf and exposed myself to considerable risk. My attorneys have advised me that California law provides that the losing party must pay the prevailing party's costs. As such, if the Defendants had prevailed in this case, I would have been subjected to a cost award in the amount of tens of thousands of dollars. Notwithstanding these risks, I chose to serve in my capacity as Class Representative and pursue all claims against Defendants and, in doing so, delayed a more immediate recovery available to me through the Labor Commissioner's office. Additionally, a simple Google search reveals that I am a class action plaintiff in an employment case against a former employer, which could very well harm my prospects for future employment.

12. Finally, I have signed a general release of all claims up through the date of final approval of the settlement. This is also significant because while employed by Defendants, I complained repeatedly about Defendants' wage practices, and I believe I was retaliated against by Defendants' reduction of my hours and other retaliatory measures taken against me. Because of that, I may have been able to file and recover additional sums based on how I was treated at Defendants. Nevertheless, I pursued this case to stop Defendants' unlawful wage practices, and to right the wrongs that Defendants imposed on myself and other non-exempt employees. As such, I believe that $10,000 for my class representative incentive award is fair and reasonable.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on November 13, 2026.

DocuSigned by:
Jesus Rodriguez
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Jesus Rodriguez