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Attorneys for Plaintiffs and the Classes

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND 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

CLASS ACTION

[Assigned to the Hon. Winston Keh, Dept.: S37]

DECLARATION OF SEAN M. NOVAK, ESQ., IN SUPPORT OF PLAINTIFFS' UNOPPOSED NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT, ATTORNEYS' FEES AND COSTS, AND CLASS REPRESENTATIVE SERVICE AWARD

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

DECLARATION OF SEAN M. NOVAK

I, Sean M. Novak, declare as follows:

1. I am a fully qualified, adult resident of the State of California, and if called as a witness, I would testify truthfully to the matters set forth. All of the matters herein are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I am an attorney duly admitted to practice law before the courts in the State of California. I am Principal of the Novak Law Firm PC, co-counsel with Burrows Law Firm, APC, for Plaintiffs Julia Gonzales and Erika Brito ("Plaintiff Gonzalez" and "Plaintiff Brito" or "Plaintiffs") in the instant action entitled, *Julia Gonzales, Erika Brito and Jesus Rodriguez v. PMC Southwest LLC, The Arcticom Group LLC, et al.,* San Bernardino Superior Court, Case No. CIVSB2409006, with the original Complaint filed on May 2, 2023, in Los Angeles Superior Court and subsequently transferred to San Bernardino County via consolidation. Burrows Law Firm and The Novak Law Firm have a co-counsel fee-share agreement that provides for 25% to Novak Law Firm and 75% to Burrows Law Firm for Court approved fees, with Court approved cost reimbursement to be distributed as incurred. Plaintiff and his co-counsel have executed a fee-share agreement that includes written consent from Plaintiff.

3. This Declaration is submitted in support of Plaintiff's Motion for Final Approval of Class Action Settlement.

4. I have been practicing law for over twenty-eight (28) years with a practice focused nearly entirely on servicing the Los Angeles County/Southern California community. A significant portion of my practice involves employment-related litigation.

5. My duties and responsibilities in this matter have included, but were not limited to, working with co-counsel from inception through preparation for mediation and tasks thereafter, which involved document review and analysis, discussing litigation strategy, discovery and data analysis, assisting with the drafting of pleadings, coordinating with Plaintiff's expert, drafting and responding to discovery, communication with putative class members and performing legal and factual research and analysis.

6. The Novak Law Firm PC has paid the majority of litigation costs associated with this case. To date, my Firm's costs associated with this matter total $12,456.92. A true and correct copy of my cost detail is attached hereto as **Exhibit A**.

7. As co-counsel for Plaintiff, I have been involved to varying degrees in all aspects of this litigation from its inception. Since my involvement in the instant litigation, which began prior to the filing of the Complaint on May 2, 2023, over three (3) years ago, I have personally spent in excess of Fifty (50) attorney hours on this case. I have previously been approved at a fee rate of $995 per hour. My loadstar is as follows: 50hrs x $995 = $49,750. This is consistent with my experience and in line with counsel's expectation. Throughout the litigation I have worked with and/or assisted my co-counsel with tasks and responsibilities necessary to prosecute this case including, but not limited to, overseeing case management generally, assisting with informal discovery, motion practice, communicating with class members, and responding to inquiries. Greater detail of the work completed by Class Counsel in this case are set forth in the declaration of Christopher L. Burrows, filed concurrently herewith.

I declare under penalty of perjury under the laws of the state of California and the United States that the foregoing is true and correct. Executed this 16th day of November, 2026, at Manhattan Beach, California.



Sean M. Novak

EXHIBIT A

USA Express Receipt

8970417	$11.85
9284066	$1,535.83
9666867	$17.25
10570027	$17.25
10463485	$17.25
10900171	$17.25
11449830	$17.97
12769912	$17.96
14661491	$15.01
14824345	$41.86
15034937	$21.16
15177852	$21.16
15237779	$21.16
12629539	$17.96
Kevin Barnes Mediation	$5,333.00
Kevin Barnes Mediation	$5,333.00
Total	$12,456.92