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Mark Doyon and the Proposed Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF STANISLAUS

MARK DOYON, individually and on behalf of others similarly situated, and on behalf of other aggrieved employees pursuant to the Private Attorneys General Act,

Plaintiff,

vs.

QD ELECTRICAL SERVICES, INC., a California corporation; JEFFREY LEWIS, an individual; and DOES 1 through 50, inclusive,

Defendants.

Case No.: CV-24-002017

DECLARATION OF PLAINTIFF MARK DOYON IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Hearing Information:

Date: February 23, 2027
Time: 8:30 a.m.
Dept.: 24

Doc ID: 6a5cb701fa9559d0e4c18de01772b0d032206dda

DECLARATION OF MARK DOYON

I, Mark Doyon, declare as follows:

1. I am over the age of 18 years old and a resident of the State of California. I have personal knowledge of the matters set forth herein, and if called upon to testify, I could and would do so competently. I make this declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I am the named Plaintiff and proposed Class Representative in the above-captioned action (the "Action"). In this declaration I set forth a summary of my efforts and participation in the Action, my common experience with the other class members, and my understanding of my responsibilities and duties as class representative for the other class members.

3. I was employed by QD Electrical Services, Inc. ("QD Electrical") as an hourly-paid, non-exempt employee from approximately March 2022 through September 2023. I worked as an Electrical Foreman during my employment with QD Electrical.

4. I believe that I had a similar experience with QD Electrical compared to the other Class Members because we were all subjected to the same policies and practices.

5. I understand that as Class Representative I have an important duty to look out for the best interests of the Class. I understood from the start of considering this case based on my discussions with my lawyers that I would have to take on significant responsibilities and burdens for the benefit of the Class, which could include having my deposition taken and giving testimony under oath, facing the possibility of subpoenas being issued to former and current employers, and testifying in Court for the benefit of not only myself but the other members of the Class. I have had numerous conversations with my attorneys regarding this case in order to provide them with the information and documents that they needed to handle the matter. I answered numerous questions that my attorneys had about the case, reviewed the complaint when it was filed, participated in mediation and resolution of the matter, and reviewed the settlement agreement.

6. I have taken my responsibility as Class Representative seriously and will continue to do so. I have learned about the laws relating to the issues in this Action, including laws about minimum wages, overtime, meal breaks and rest breaks.

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7. I know of no conflicts between my interests and goals and the interests and goals of anyone else in the Class.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 2, 2026, in Stanislaus County, California.



MARK DOYON

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