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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SACRAMENTO**

AARON ALVAREZ and MICHAEL ARMOUR,
 individually, and on behalf of all others similarly
 situated,

Plaintiffs,

v.

AMAROK LLC, a Delaware limited liability
 company; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 24CV008395 (Lead Case)
 Case No.: 24CV013383

*Assigned for all purposes to:
 Hon. Jill H. Talley
 Dept. 23*

**DECLARATION OF MICHAEL
 ARMOUR IN SUPPORT OF
 PLAINTIFFS' MOTION FOR FINAL
 APPROVAL OF CLASS ACTION AND
 PAGA SETTLEMENT**

Final Approval Hearing:
 Date: October 17, 2025
 Time: 9:00 a.m.
 Dept.: 23

Action Filed: April 30, 2024

DECLARATION OF MICHAEL ARMOUR

I, Michael Armour, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness. I submit this declaration in support of my Motion for Final Approval of Class Action and PAGA Settlement.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

2. When I decided to become involved in this lawsuit as a class representative on behalf of other employees of Amarok LLC (collectively, “Amarok” or “Defendant”) and as a private attorney general for the State of California, I understood that I was not only seeking unpaid wages and penalties on behalf of myself, but also for other employees who worked for Amarok, and that by doing so, I would be delaying more immediate recovery available to me through the Labor Commissioner’s office.

3. I was also made aware that being a class representative and private attorney general in an action filed on behalf of others would subject me to a stigma that is sometimes associated with those who bring these kinds of lawsuits. I was aware that, as a class representative and private attorney general, I might be responsible for some or all of Amarok’s legal costs if the case was not successfully concluded. Even with knowledge of these risks, I was willing to go forward and to act on behalf of the other employees and the State of California, but I was nervous about losing and having a judgment filed against me for costs or losing job opportunities in the future.

4. I understood that there were risks involved in class and representative action lawsuits. I understood that the lawsuit could continue for several years and require my services and attention throughout the entire length of the lawsuit. I learned that even if we won at trial, the case could be further delayed by appeals.

Notoriety and Personal Difficulties Encountered

5. As a named plaintiff, I am the face of the litigation. Additionally, the class notice that was mailed in this case was sent 48 current and former employees of Amarok. The notice informed all of these employees that I filed a class and representative action against Amarok. Exposing myself to this kind of publicity creates a risk for my future career prospects, since current and former

employees of Amarok may move to different companies within the security industry or may know people at other companies within the security industry who may not want to hire someone who sued his employer.

Amount of Time and Effort Spent and Duration of the Litigation

6. I have spent a substantial amount of time and effort on this litigation. My work on this case has included, among other things, searching for and providing my counsel with related employment documents, describing my experiences working for Amarok, identifying potential witnesses, assisting my attorneys in preparing for mediation, and participating in settlement discussions. After mediation, I remained actively involved by reviewing the settlement papers. I estimate that since I retained my counsel in December 2023, I have spent approximately 30 hours on the activities described above.

Personal Benefit Received as a Result of the Litigation

7. Absent the requested service payment, the personal benefit I will receive is the same as all other employees. But unlike the other employees, I have signed a general release for Amarok. The other employees are only releasing the wage and hour claims asserted in the lawsuit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 9/22/2025, at Los Angeles, California.

DocuSigned by:

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Michael Armour