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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

JUSTIN BROWN, and SHAYNA
AMSTER individually, on a representative
basis, and on behalf of all others similarly
situated;

Plaintiffs,

vs.

JOSHUA'S PEST CONTROL, a
California Limited Partnership; MOXIE
PEST CONTROL, L.P., an Entity
Unknown; MOXIE ADVISORS, LLC, a
Utah Limited Liability Company;
WALTON HOLDINGS GP, LLC, a Texas
Limited Liability Company;
MGFLEMING HOLDINGS, INC., a
California Corporation; and DOES 1
through 20, inclusive;

Defendants.

Case No.: CVRI2402875
*[Assigned to Hon. Harold Hopp, Dept 1, for all
purposes]*

**DECLARATION OF PLAINTIFF JUSTIN
BROWN IN SUPPORT OF MOTION FOR
FINAL APPROVAL**

1 I, Justin Brown, state and declare:

2 1. I am the Plaintiff in the above captioned action and have personal knowledge of
3 all matters stated herein and could competently testify thereto.

4 2. I make this declaration in support of the motion for final approval of the class
5 action settlement. I believe that the settlement is fair and reasonable and constitutes a fair
6 resolution of the claims alleged.

7 3. During my employment with JPC, there were several issues that concerned me
8 and which I thought did not comply with California law, such as not being paid properly and not
9 getting proper meal periods and rest breaks. Even though I was unsure if I wanted to bring a
10 lawsuit because of the risk of stepping forward as a whistle blower, I retained Lauby, Mankin &
11 Lauby LLP to proceed with this class action because I did not think that myself or the other
12 employees were being treated correctly.

13 4. When I first retained my attorneys (Lauby, Mankin & Lauby) and chose to pursue
14 this case on a class action basis, I understood that I had specific burdens as the "Class
15 Representative," which included: (a) representing the interests of all class members, (2)
16 considering the interests of all class members above my own personal interests, (3) participating
17 actively in the lawsuit, including potential testimony at deposition and trial, and keeping
18 generally aware of the status and progress of the lawsuit. Moreover, I understood that any
19 resolution of the lawsuit is subject to court approval and must be designed in the best interests of
20 the class as a whole.

21 5. The settlement administrator advised that my current estimated shares of this
22 settlement are as follows: \$799.87 as my Individual Class Payment, and \$30.91 as my Individual
23 PAGA Payment. The Parties have also agreed to a service award (subject to this Court's
24 approval) of \$10,000. I respectfully request that the Court approve the full service award
25 requested for the following reasons.

26 6. First, by bringing this case (and doing so as a class action), I undertook significant
27 risks and stresses at a high emotional cost without any guarantee of success. Filing this lawsuit
28 and being a whistle blower was stressful on a day-to-day basis as I have constantly worried about

1 the risk that this case could impact my ability to find future jobs, especially in the same industry.
2 Yet I still agreed to step forward to bring these claims, hoping to make a positive change and
3 recover what my coworkers and I were owed.

4 7. Second, I have spent substantial time working on this case and have performed
5 substantial services for the Class to help obtain a highly beneficial settlement for my fellow
6 employees. Since first initiating this action, I estimate that I have spent at least 50 hours engaged
7 in activities to benefit the class. I have assisted my attorneys in numerous ways, including
8 helping to explain and discuss the company's practices and their general practices and
9 procedures, locating and analyzing company documents, and communicating with other class
10 members. These efforts occurred through numerous meetings with Class Counsel, telephone
11 conferences, letters, emails, and text communications. I also assisted in preparation for mediation
12 helped obtain a positive result for the class and reviewed all settlement documents.

13 8. Third, I respectfully request that the Court approve the agreed-upon service award
14 because I agreed to set aside my personal interests and to put the interests of the class ahead or
15 on par with my own. In doing so, and by successfully bringing this case as a class action, I
16 helped to obtain a highly beneficial settlement for the class members.

17 9. Fourth, bringing this case also came with a major financial risk because, if I lost
18 the case, I would be required to pay the company's costs, which could be over \$10,000.

19 10. For these reasons, and because my decision to step forward resulted in a very
20 favorable settlement for the other class members, I respectfully request that the Court approve
21 the \$10,000 service award.

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct. Executed on Apr 10, 2026, at San Diego, California.

24 By: 
25 Justin Brown (Apr 10, 2026 09:47:56 PDT)
26 Justin Brown
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