

DIVERSITY LAW GROUP, P.C.
Larry W. Lee (State Bar No. 228175)
lwlee@diversitylaw.com
Simon L. Yang (State Bar No. 260286)
sly@diversitylaw.com
515 South Figueroa Street, Suite 1250
Los Angeles, California 90071
Telephone: (213) 488-6555
Facsimile: (213) 488-6554

POLARIS LAW GROUP
William L. Marder (State Bar No. 170131)
bill@polarislawgroup.com
501 San Benito Street, Suite 200
Hollister, California 95023
Telephone: (831) 531-4214
Facsimile: (831) 634-0333

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

JENNY BARRETT, as an individual and on
behalf of all others similarly situated, and as a
private attorney general,

Plaintiff,

vs.

ORION CONSTRUCTION CORP., a California
corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 37-2024-00024473-CU-OE-CTL

[Hon. Michael D. Washington, Department C-73]

**DECLARATION OF JENNY BARRETT IN
SUPPORT OF PLAINTIFF’S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: September 11, 2026
Time: 9:00 a.m.
Department: C-73

Complaint Filed: May 24, 2024
FAC Filed: September 25, 2024
SAC Filed: January 29, 2025

1 I, Jenny Barrett, declare as follows:

2 1. I am an individual over the age of 18. I am the named plaintiff in the above-reference
3 action. I have personal knowledge of the facts set forth below, except as to those matters stated on
4 information and belief and, as to those matters, I believe them to be true. If called as a witness, I could
5 testify competently as to the matters stated in this declaration.

6 2. In January of 2024, I began working for Orion Construction Corp. as a truck driver. Until
7 my employment ended in May of 2024, I was paid on an hourly basis as a non-exempt employee.
8 Throughout my employment, the company provided me with wage statements that showed (i) the
9 corresponding number of hours worked at various hourly rates, without showing the actual rates, and
10 (ii) the pay period end date, without showing the pay period begin date.

11 3. During the pendency of this lawsuit, I have done my best to represent the interests of the
12 employees that are part of the class. I have actively contributed to the litigation of this case. My
13 contributions include but are not limited to (i) participating in numerous telephonic meetings with my
14 attorneys and their staff to discuss the case and review documents prepared on my behalf, (ii) providing
15 my attorneys with information and documents regarding my employment, (iii) searching for additional
16 information and documents requested by my attorneys, (iv) reviewing and approving the written notice
17 to the Labor and Workforce Development Agency, the complaint and amendments to the complaint, and
18 other papers filed with the court, (v) reviewing documents and information my attorneys were provided
19 by the company or its attorneys, (vi) participating in the discovery process and reviewing related
20 documents, (vii) participating in mediation, (viii) reviewing and executing the settlement agreement, and
21 (ix) reviewing and signing documents submitted to this Court in support of the settlement.

22 4. I have taken all necessary steps to represent the interests of the Class, including by
23 providing information and documents to my counsel, discussing the claims and lawsuit with my counsel,
24 and answering any questions that have come up. I remain willing to devote my time to this lawsuit for
25 the benefit of the Class. I do not believe I have any interests that are adverse to the interests of the Class.
26 I also am unaware of any such issues having been raised or presented by anyone else.

27 5. I believe many employees would not sue their employer out of fear. I took on risks by
28 bringing this lawsuit, and I understand that other people will benefit because of the actions that I have

1 taken. I feel that it is a positive accomplishment, am proud of the result, and believe that the class
2 settlement is fair, adequate, and reasonable.

3 6. I am informed and believe that there are other individual claims that I could have pursued
4 against the company. Nonetheless, I am executing a general release of any and all claims, including a
5 waiver of any rights I have under Civil Code section 1542. I understand the proposed settlement does
6 not require similar releases of any other employees.

7 I declare under penalty of perjury under the laws of the State of California that the foregoing is
8 true and correct. Executed this 25 day of March 2026, at Campo, California.

Signed by:

Jenny Barrett

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Jenny Barrett