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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN LUIS OBISPO

GREGORY TYSON VANCIL, on behalf of
the State of California as the Real Party in
Interest;

Plaintiff,

vs.

PIPEDREAMS VENTURES, INC., a
Delaware Corporation; and DOES 1 through
20, inclusive;

Defendants.

Case No.: 24CVP-0226
*[Assigned to Hon. Michael C. Kelley, Dept.
P-2, for all purposes]*

**DECLARATION OF GREGORY TYSON
VANCIL IN SUPPORT OF MOTION TO
APPROVE SETTLEMENT PURSUANT
TO THE PRIVATE ATTORNEYS
GENERAL ACT OF 2004**

I, Gregory Tyson Vancil, state and declare:

1. I am the Plaintiff in the above-entitled action. I am fully familiar with the facts of this case and hereby make this declaration in support of the motion for approval. I believe that the settlement is fair and reasonable and constitutes a fair resolution of the claims alleged. The matters set forth herein are based upon my personal knowledge and if called upon as a witness, I could and would give competent testimony with respect to the matters contained herein.

2. During my employment with Defendant, I thought that were issues with my pay and how my employment ended. I started researching California law and contacted attorneys

1 regarding these issues.

2 3. Since first initiating this action on behalf of the other employees, I believe that I
3 have more than adequately performed my duties as a representative. I have been an active
4 participant in this litigation, including assisting my attorneys in various ways and making myself
5 available when needed. For example, I have assisted my attorneys by compiling and analyzing
6 substantial documentation regarding the claims in this case. I have also helped to explain and
7 discuss the company's practices and their general practices and procedures, locating and
8 analyzing company documents, among others. I have also reviewed all settlement documents.
9 Finally, I will continue to take all steps necessary to finalize this settlement and obtain court
10 approval.

11 4. Since first initiating this action, I estimate that I have spent at least 50 hours
12 engaged in activities to benefit the State and the Aggrieved Employees. I have assisted my
13 attorneys in numerous ways, including helping to explain and discuss the company's practices
14 and their general practices and procedures, locating and analyzing company documents,
15 preparing for and making myself available for the all-day mediation (including discussing the
16 company's general policies, practices, and procedures), and then reviewing all settlement
17 documents through this approval process. These efforts occurred through numerous telephone
18 conferences, letters, emails, and text communications.

19 5. Filing this lawsuit and the concerns of being seen as a whistleblower was stressful
20 on a day-to-day basis as I have constantly worried about the risk that this could impact my ability
21 to find future jobs. I was worried that filing the case may get me labeled as a whistleblower,
22 resulting in retaliation and difficulty finding work for the rest of my career. Additionally, I faced
23 financial risk in bringing this case because, if I lost the case, I would be required to pay the
24 company's costs, and there was a chance they could try to make me pay their attorneys' fees as
25 well (fortunately, because of the settlement, I did not have to incur any expenses in prosecution
26 of this action).

27 6. As a condition of individual settlement, I was required to compromise on and
28 waive my separate individual claims.

7. I believe that request for the \$5,000 service award is justified based on (a) the time I have spent on the case, (b) the risks I took in bringing this case, and (c) my agreement to waive all of my individual claims for wrongful termination. I respectfully request that the Court approve the agreed-upon service award.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 03/31/26, in Paso Robles, California.


Tyson Vancil (Mar 31, 2026 12:50:21 PDT)

Gregory Tyson Vancil