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Attorneys for Plaintiff

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

VICENTE SANDOVAL, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

CYBEX SECURITY SOLUTIONS, LLC, a
California Limited Liability Company;
SONITROL ORANGE COUNTY, LLC, a
California Limited Liability Company; and
DOES 1 through 100, inclusive,

Defendants.

Case No. 30-2024-01398109-CU-OE-CXC

*[Assigned for all purposes to the Hon. Layne H.
Melzer, Dept. CX102]*

**DECLARATION OF IAN T. MALLERY IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA ACTION
SETTLEMENT**

Date: September 11, 2025

Time: 2:00 p.m.

Dept.: CX102

Reservation ID No.: 74579556

Action Filed: May 8, 2024

Trial Date: None Set

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I, IAN T. MALLERY, declare as follows:

1. I am an associate with Haines Law Group, APC, and counsel for the named Plaintiff Vicente Sandoval (“Plaintiff”) in the above-captioned matter. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I received a Bachelor of Arts degree from Washington University in St. Louis in 2021, and a Juris Doctor from the University of Minnesota Law School in 2024. I was admitted to the California State Bar in December 2024.

3. During law school, I served as Student Director of the University of Minnesota Clemency Project Clinic and was selected as a Human Rights Fellow with the University of Minnesota Human Rights Center.

4. Prior to and during law school I interned and clerked for the American Civil Liberties Union of Missouri, where I worked on individual civil rights litigation cases, including drafting complaints, memoranda, and briefs on substantive litigation issues. I also participated in a year-long internship with the National Labor Relations Board – Region 18, where I investigated unfair labor practices charges, negotiated settlements, drafted memoranda, and issued complaints on behalf of the General Counsel. Since September 2024, I have worked as an associate at Haines Law Group, APC.

5. Although non-exhaustive, the types of tasks I have performed include: conducting client intakes, drafting complaints, attending court hearings in state and federal courts, corresponding with opposing counsel, drafting and responding to written discovery, drafting and opposing a variety of motions including motions for summary judgment, drafting mediation briefs, attending mandatory settlement conferences, drafting long-form settlement agreements, and drafting motions for preliminary and final settlement approval.

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1 6. The following is a non-exhaustive list of the class action settlements in which I
2 played a major role assisting Class Counsel, and which have been granted final approval: *Raul*
3 *Camacho v. Residential Fire Systems, Inc.* Case No. 30-2015-775372-CU-OE-CXC, Orange
4 County Superior Court; *Ruben Hernandez v. Neovia Logistics Services, LLC*, Case No.
5 CIVSB2305867, San Bernardino County Superior Court; *Juan David Arreola Carillo v. KPS*
6 *Global, LLC*, Case No. 22STCV19527, Los Angeles County Superior Court; *Eric Prado v.*
7 *Wilwood Engineering*, Case No. 2023CUOE015773, Ventura County Superior Court.

8 7. As counsel for Plaintiff, I have been closely involved in all aspects of this litigation
9 since I first joined Haines Law Group, APC. The details of the work completed by Plaintiff's
10 Counsel in this case are set forth in the declaration of Matthew K. Moen, filed concurrently
11 herewith.

12 8. I confirm that I do not have any interest or involvement in, and am not affiliated
13 with, the proposed settlement administrator, Apex Class Action Administration.

14 I declare under penalty of perjury under the laws of the United States and the state of
15 California that the foregoing is true and correct. Executed on June 5, 2025, at El Segundo,
16 California.



Ian T. Mallery