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Attorneys for Plaintiff MARIA REYES,
 individually and on behalf of all others similarly situated

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

MARIA REYES individually and on
 behalf of all others similarly situated,

Plaintiffs,

v.

DMS BUILDING MAINTENANCE,
 INC., a California Corporation, and
 DOES 1-50,
 inclusive,

Defendants.

CASE NO.: 30-2019-01077939-CU-CXC

Hon. Melissa R. McCormick
 Dept. CX105

**DECLARATION OF PLAINTIFF
 MARIA REYES IN SUPPORT OF
 MOTION FOR PRELIMINARY
 APPROVAL OF CLASS AND PAGA
 ACTION SETTLEMENT**

Date: March 19, 2026
 Time: 2:00 p.m.
 Dept.: CX105

DECLARATION OF MARIA REYES

I, MARIA REYES hereby declare as follows:

1. I am over the age of eighteen and I submit this Declaration in support of the Plaintiff's Motion for Preliminary Approval of Class Action Settlement. The following is based upon my personal knowledge and if called as a witness, I could and would competently testify thereto.

2. I was employed by Defendant DMS Building Maintenance Inc., ("Defendant") as a Non-Exempt Employee as a Janitor. I was assigned to various locations throughout Huntington Beach, Buena Park, and Westminster, including churches and corporate office buildings, performing duties relating Defendant's contract cleaning and facility support services business.

3. As a non-exempt employee, I suffered the same damages as other employees. These included not being paid all my wages and not timely paid wages upon my separation from Defendant's employ all in accordance with California law. As a result of these alleged violations, I sought consultation with my attorneys at James Hawkins, APLC.

4. Based upon my allegations, and after consultation and full disclosure from my attorneys about the potential risks I faced as a Plaintiff in a putative class action, I freely decided to pursue this lawsuit to try and vindicate my rights and the rights of others who also worked for Defendant and suffered similar harms due to Defendant's common practices and policies.

5. Prior to filing my action, my attorneys and I had multiple conferences about the factual bases for the claims that I wanted to pursue against Defendant. During those conferences, my attorneys provided me with an overview of how those claims would be litigated and generally educated me about the nature of complex/representative litigation and my role as the representative Plaintiff.

6. My attorneys provided me with a draft of the complaint for my review and approval. I closely reviewed the complaint to ensure accuracy and completeness. As a result, I caused my attorneys to file the class action complaint alleging claims for the allegations alleged therein. Thereafter, I have been fully involved in my case. Following the filing of the

1
2 complaint, I collaborated with my attorneys on the prosecution of my claims, and I regularly
3 contacted my attorneys to stay current on the status of the litigation, and to discuss my
4 attorneys' progress in prosecuting the claims.

5 7. I believe that I have been similarly injured as to all other class members in the
6 settlement who worked for Defendant during the class period. I believe the claims asserted in
7 this action are also shared by the other Class Members. I worked with various other non-exempt
8 employees, and I believe we were all treated the same and subject to the same unlawful policies.

9 8. On June 19, 2019, I, through my attorneys, filed this action against Defendant.

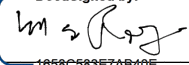
10 9. Since I agreed to become a Class Representative, I have worked every step of the
11 way with my attorneys. During the course of the litigation, I have always kept the best interest
12 of the Class Members on equal footing as mine. I have been, and I am willing to continue to
13 pursue the Class Members' claims vigorously on our collective behalf if the Settlement is not
14 finally approved. As a result, I firmly believe that I do not have any interests adverse to the
15 interests of the Class Members. I have maintained the Class Members' best interest from the
16 inception of the case.

17 10. As the Class Representative, I have spent numerous hours consulting with my
18 attorneys, providing documentation, consulting with other Class Members, responding to
19 questions by my attorneys, responding to written discovery and producing documents to my
20 attorneys, working with my attorneys to review documents received, preparing for my
21 deposition, although it was not taken, helping my attorneys in preparing for the mediations and
22 attending the mediations via telephone. I was consulted about the status of the case and
23 provided constant feedback about the case from my attorneys including the mediation,
24 settlement negotiations and eventual settlement. I estimate I have spent approximately 40-45
25 hours working on this case.

26 11. From the beginning of this case, I have freely chosen to accept the risks of
27 being the Class Representative in this class action lawsuit. I chose to assume these risks and
28 pursue the claims on behalf of the Class Members as I wanted to vindicate their rights. I believe
we have achieved that result with the settlement and the individual payments to the Class

Members. I believe the settlement is fair reasonable and adequate based on the numerous defenses asserted by Defendant. I believe the efforts and work I put forth helped to achieve the fair settlement that will benefit the Class Members. As a result of my efforts, I also believe the Enhancement Award is reasonable, and I respectfully request the Court approve the amount of \$7,500.00 to each Plaintiff as fair and reasonable.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct. Executed on January 14, 2026, at Sun City, California.

DocuSigned by:

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MARIA REYES