Docusign Envelope ID: 7939E9D3-DCBA-8105-8083-5E790F3D53E8

John G. Yslas (SBN 187324)
john.yslas@wilshirelawfirm.com
William M. Pao (SBN 219846)
william.pao@wilshirelawfirm.com
Lucy H. Nguyen (SBN 338783)
lucy.nguyen@wilshirelawfirm.com
Matthew R. Baker (SBN 326238)
matthew.baker@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
660 S. Figueroa Street, Sky Lobby
Los Angeles, CA 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for *Plaintiffs*
JUAN LUIS MARTINEZ and ROBERT OGLESBY, JR.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF RIVERSIDE

COMPLEX CIVIL LITIGATION

JUAN LUIS MARTINEZ AND ROBERT OGLESBY, JR., individually, and on behalf of all others similarly situated,

Plaintiffs,

v.

D & D LASER SCREED, INC., a California corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: CVRI2404205 (Lead); CVRI2404949 (Consolidated)

CLASS & PAGA ACTION

ASSIGNED FOR ALL PURPOSES TO:
Hon. Harold W. Hopp, Dept. 1

DECLARATION OF ROBERT OGLESBY, JR. IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Preliminary Approval Hearing:
Date: December 10, 2026
Time: 8:30 a.m.
Dept.: 1

Reservation No.: 650367961741

Class Complaint Filed: July 30, 2024
PAGA Complaint Filed: August 30, 2024

Docusign Envelope ID: 7939E9D3-DCBA-8105-8083-5E790F3D53E8

DECLARATION OF ROBERT OGLESBY, JR.

I, Robert Oglesby, Jr., declare as follows:

1. I am an adult resident of the State of California, and if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am a former employee of D & D Laser Screed ("D & D"). I worked for D & D from approximately August 2014 to approximately December 2023 as a Laser Screen Operator. Throughout the entirety of my employment, I was subject to all of D & D's policies and practices that have been alleged as unlawful in the Private Attorneys General Act ("PAGA") Notice sent to D & D and the Labor & Workforce Development Agency and in the Complaint.

4. I initiated this lawsuit because I was concerned that I was not paid properly for all the hourly that I worked, and I was not provided all my meal and rest periods.

5. By originating this lawsuit, I hoped that I might be able to change D & D's policies to better protect the working conditions of my co-workers. I also understand that it was my duty to represent the best interests of the aggrieved employees, to know about the lawsuit, to assist my attorneys, and to keep updated on the case.

6. I have invested a lot of personal time and energy into this lawsuit. As detailed more fully below, I have spent approximately 38 hours on this case. I made it a priority to be actively involved because I wanted to do everything I could to assist my attorneys in prosecuting this case.

7. Throughout this case, I spent a lot of time on the phone with my attorneys to get updates about the case and provide them with information. For example, during some of the phone calls, my attorneys and I were able to identify instances when I was not paid correctly. Additionally, leading up to the mediation, I had multiple lengthy phone calls with Wilshire Law

Docusign Envelope ID: 7939E9D3-DCBA-8105-8083-5E790F3D53E8

Firm, PLC regarding the claims at issue and what was to transpire at the mediation.

8. Throughout the case, I also spent time looking for documents relevant to the case to send to my attorneys. I spent numerous hours looking for documents, including when I first contacted my attorneys, before the lawsuit was filed, and before my case was mediated. I also spent time reviewing legal documents in this case, including the retainer and settlement agreement and discussed, in detailed, the terms with my attorneys.

9. Additionally, I made myself fully available on the day of mediation and was in continuous contact with my attorneys to assist with any questions or issues that may have arisen.

10. I believe the settlement is a good settlement and I would recommend that the Court approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad that I had the opportunity to represent the Class Members and Aggrieved Employees in this lawsuit and that I was able to obtain a monetary recovery for them.

11. I did not make the decision to file this action lightly. I was concerned by the attention a publicly filed lawsuit, and especially a representative action, would attract. My name would be associated with a lawsuit that I filed against my former employer. I am mindful that prospective employers might find out that I sued D & D. Nevertheless, I felt that important rights were at stake, that others were being harmed, and that something ought to be done about it.

12. I also understand that there was financial risk in bringing this lawsuit. For example, I knew that if I did not prevail in this lawsuit that I could potentially be responsible for D & D's attorneys' fees and costs.

13. I understand that the settlement agreement provides a service payment to me in the amount of $10,000.00. I believe this amount is fair compensation for my time and effort on this case, my help in prosecuting this case, and the risks with respect to my future employment.

14. Based on my involvement in this case and the benefits provided to my former co-workers, I can say I helped stand up for the other workers who might have been too afraid to say anything to management because they did not want to risk losing their jobs or risk the stigma of suing an employer. I was not afraid to take that risk because I strongly care about helping out my former co-workers.

Docusign Envelope ID: 7939E9D3-DCBA-8105-8083-5E790F3D53E8

15. I carefully reviewed and ultimately signed the Class Action and PAGA Settlement Agreement and my attorneys answered all the questions I had. I believe the settlement terms and allocations are fair, adequate, and reasonable given the strength of the Class and PAGA claims and D & D's defenses.

16. I have no conflicts of interest with any Class Member or Aggrieved Employee or the settlement administrator, xPand Legal Consulting, LLC.

17. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

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

Executed on 10/7/2026, at Lake Elsinore, California.

Signed by:
Robert Oglesby Jr.
B4EB5ABC91F94D4...

Robert Oglesby, Jr.