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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE

FALCAO RIVELINO HERNANDEZ and
SERGIO RODRIGUEZ NAVA, individually and
on behalf of others similarly situated, and as
aggrieved employees and Private Attorneys
General,

Plaintiffs,

vs.

LDI MECHANICAL, INC., a Delaware
corporation doing business in California; and
DOES 1 through 50, inclusive,
Defendants.

Case No. CVRI2401542

*[Case assigned for all purposes to the Hon.
Harold W. Hopp, Dept. 1]*

**DECLARATION OF CARLOS JIMENEZ
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA ACTION
SETTLEMENT**

Date: November 14, 2025
Time: 8:30 a.m.
Dept.: 1

Action Filed: March 22, 2024
Trial Date: None Set

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I, Carlos Jimenez, declare as follows:

1. I am a Partner with Protection Law Group, LLP, and co-counsel for the named Plaintiffs Falcao Rivelino Hernandez and Sergio Rodriguez Nava (“Plaintiffs”) 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. This declaration is submitted in support of Plaintiffs’ Supplemental Brief in Support of Motion for Preliminary Approval of Class Action and Private Attorneys General Act (“PAGA”) Action Settlement (“Preliminary Approval Motion”). After reviewing the Court’s October 3, 2025, Tentative Ruling, Plaintiffs and Defendant LDI Mechanical, Inc. (“Defendant”) (collectively with Plaintiff, the “Parties”) met and conferred regarding the issues raised by the Court, and addressed each of the issues.

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1 3. Plaintiffs' counsel is not aware of any class, representative or other collective
2 action pending in any other court that asserts claims similar to those asserted in this action.
3 Further, in advance of filing this Supplemental Brief, Plaintiffs' counsel performed a search of
4 the PAGA Case Search website (<https://cadir.my.salesforce-sites.com/PagaSearch>) and
5 CasePortal by Courthouse News Service (cncscaseportal.com) to confirm that no additional class,
6 representative or other collective actions have been filed, and no additional LWDA letters have
7 been submitted, against Defendant that assert claims similar to those asserted in this action.
8 Plaintiffs' counsel also sent firm-wide emails inquiring if any member of their respective firms
9 were aware of any class, representative, or other collective action pending in any other court that
10 asserts claims similar to those asserted in this action. No one from Plaintiffs' counsel's respective
11 firms stated that they were aware of any class, representative, or other collection action pending
12 in any other court that asserts claims similar to those asserted in this action.

13 I declare under penalty of perjury under the laws of California that the foregoing is true
14 and correct. Executed on November 5, 2025, at Canyon Country, California.

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Carlos Jimenez