BIBIYAN LAW GROUP, P .C.
Keaton D. Mendoza (SBN 321172)
kmendoza@tomorrowlaw.com
1460 Westwood Boulevard
Los Angeles, California 90024
Telephone: (310) 438-5555
Facsimile: (310) 300-1705

Attorneys for Plaintiff, Troy Krikke,
on behalf of himself and of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

TROY KRIKKE on behalf of himself and all others similarly situated and aggrieved,

Plaintiff,

v.

MEGA FLUID SYSTEMS, INC., a California Corporation; and DOES 1 through 100, inclusive,

Defendant.

CASE NO.: 24CV078540
(Related to Case No. 24CV085397)

[Assigned for all purposes to the Hon. Patrick McKinney, in Dept. 18]

DECLARATION OF DAVID D. BIBIYAN IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS AND REPRESENTATIVE ACTION SETTLEMENT AND PROVISIONAL CLASS CERTIFICATION FOR SETTLEMENT PURPOSES ONLY

DECLARATION OF DAVID D. BIBIYAN

1. I am an attorney at law, duly licensed to practice before all the Courts of the State of California and I am the Chief Executive Officer and Managing Partner of Bibiyan Law Group, P.C., counsel of record for plaintiff Troy Krikke ("Plaintiff") and all others similarly situated and aggrieved. As such, I am familiar with the file in this matter and, if called as a witness, I could and would competently testify to the following facts of my own personal knowledge.

Adequacy of Class Counsel

2. Class Counsel are experienced class action attorneys, have been appointed as class counsel in other class actions, and have successful track records in litigating class actions.

3. I graduated with a Bachelor of Arts degree from the University of California, Los Angeles in 2009.

4. I received my Juris Doctorate from The University of Chicago Law School in 2012.

5. After practicing for several years as a member of Cohen & Lord, P.C., practicing in an amorphous range of civil litigation on behalf of both plaintiffs and defendants, I opened up a law firm in 2014 with a concentration in representation of employees against employers to recover unpaid wages and vindicate harassment, discrimination and retaliation in various contexts.

6. In 2017, I created Bibiyan Law Group, P.C., which now employs almost fifty (50) attorneys, practices in multiple states around the nation, and concentrates in employment matters, including class action litigation, although we also bring class actions in the field of data privacy, as well.

7. I am an active member of the California Employment Lawyers' Association ("CELA"), one of only a few members of its Reverse Auctions Subcommittee and serve as a mediator between other plaintiffs' counsel who bring overlapping class actions. I have also attended various Continuing Legal Education courses pertaining to advocacy on behalf of employees.

8. I also created the content for, helped organize, and served as the Moderator for the 2023 California Complex Symposium Wage and Hour/PAGA Section, a Continuing Legal Education seminar and forum featuring four respected Judges serving in the Complex Divisions of

their respective county Superior Courts. In addition, my firm served as a sponsor of that event.

9. Once again, in 2026, I helped create content for, helped organize, and served as a Moderator for the 2026 California Complex Symposium Class Action Section, a Continuing Legal Education seminar and forum featuring four respected Judges in the Complex Divisions of their respective Superior Courts. My Firm, again, served as a sponsor for the event.

10. Not only have I practiced almost exclusively in this field for years and have contributed to the legal education curriculum for attorneys practicing within it, I am also a published author in the Daily Journal as a contributor in the Wage and Hour and PAGA context, including, in December 15, an article entitled: "PAGA: What's Gone, What's Left and What's Next." I have also been a quoted source in multiple other publications, including in article published by Bloomberg Law dated November 1, 2023 entitled: "Adidas, Home Depot Sued in Test Cases on Job Ad Pay Transparency."

11. My firm has the experience, resources, and means necessary to allow us to provide adequate representation as Class Counsel to all class members in this litigation. With approximately fifty (50) attorneys, as well as supporting staff consisting of paralegals and legal assistants, my office has the capacity to represent hundreds of thousands of class members, bring forth efficient resolution of class actions and PAGA actions, engage in complex litigation, file contested motions for class certification, and engage in trial practice.

12. My office has filed contested motions for class certification in the past and have been appointed Class Counsel by the Superior Court of California in the past for purposes of certifying a class for settlement purposes. Some examples of Actions in which I was appointed Class Counsel include:

- *Santoyo v. Consolidated Foundries, Inc.,* Case No. BC612298, California Superior Court, County of Los Angeles, Honorable Judge Ann I. Jones, presiding;
- *Arensdorff v. Stanley Steemer International, Inc.*, Case No. BC681368, California Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos, presiding;
- *Barreto v. Don Roberto Jewelers, Inc.*, Case No. BC495451, California Superior Court, County of Los Angeles, Honorable Ann I. Jones, presiding;

• *Junior Amilcar Laguna Gonzalez v. Takaaki Koyama,* Case No. BC641998, Los Angeles Superior Court, Honorable Elihu M. Berle, presiding;

• *Rios v. Nongshim America, Inc.*, Case No. CIVDS1807390, California Superior Court, County of San Bernardino, Honorable David S. Cohn, presiding;

• *Stoddard v. Molded Fiber Glass – West,* Case No. 1517758, California Superior Court, County of San Bernardino, Honorable David S. Cohn, presiding;

• *Mata v. Sahara Scaffold, Inc.*, Case No. CIVDS1810785, California Superior Court, County of San Bernardino, Honorable David S. Cohn, presiding;

• *Carrasco v. Pure Dental Solutions*, Case No. BC645995, Los Angeles Superior Court, Honorable Kenneth R. Freeman, presiding;

• *Gonzalez v. Gochez, et al.*, Case No. BC648729, Los Angeles Superior Court, Honorable Maren Nelson, presiding;

• *Montoya v. Superior Paving Co.*, Case No. CIVDS1833422, County of San Bernardino, Honorable David S. Cohn, presiding;

• *Lopez v. Norred & Associates, Inc.,* Case No. CIVDS1824109, California Superior Court, County of San Bernardino, David S. Cohn, presiding;

• *Noyola v. Lacren, LLC,* Case No. BC717024, California Superior Court, County of Los Angeles, Hon. Anthony Mohr, presiding;

• *Luciano, et al. v. O'Tasty Foods, Inc., et al.*, Case No. BC711988, California Superior Court, County of Los Angeles, Honorable Maren Nelson, presiding;

• *Gordon v. Hospice Source, LLC,* Case No. 34-2018-00250022-CU-OE-GDS, California Superior Court, County of Sacramento, Honorable Christopher E. Krueger, presiding;

• *Barragan v. Refrigeration Supplies Distributor*, Case No. 19STCV09312, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;

• *Ramirez v. Acre Gourmet, Inc.,* Case No. CGC-19-575117, California Superior Court, County of San Francisco, Honorable Andrew Y.S. Cheng, presiding;

• *Villafuerte v. Bay Alarm Company*, Case No. BC689110, California Superior Court, County of Los Angeles, Honorable Amy D. Hogue, presiding;

• *Cazares v. Areas USA LAX, LLC,* Case No. 19STCV08209, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;

• *Magana v. Castlerock Environmental, Inc., et al*., Case No. 19STCV38353, California Superior Court, County of Los Angeles, Honorable Ann I. Jones, presiding;

• *Chilel v. Sushi California, Inc.*, Case No. 19STCV08209, California Superior Court, County of Los Angeles, Honorable Ann I. Jones, presiding;

• *Malone v. Orange Courier, Inc., et al.,* Case No. 30-2016-00763474, California Superior Court, County of Orange, Honorable Glenda Sanders, presiding;

• *Rivera v. Talamo Food Services, Inc.,* Case No. 19CV355856, California Superior Court, County of Santa Clara, Honorable Patricia M. Lucas, presiding;

• *Olguin v. Cal Central Harvesting, Inc.,* Case No. 18CV03860, California Superior Court, County of Santa Barbara, Honorable James F. Rigali, presiding;

• *Pence v. Sober Living by the Sea, Inc.,* Case No. 2018-00988742, California Superior Court, County of Orange, Honorable Randall J. Sherman, presiding;

• *Franco v. Vincent Rags, Inc.,* Case No. 20STCV07768, California Superior Court, County of Los Angeles, Honorable Ann I. Jones, presiding;

• *Cabral v. Miller Castings, Inc.*, Case No. 19STCV39556, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;

• *Bolanos v. Texas Roadhouse, Inc.*, Case No. 19STCV39556, California Superior Court, County of Los Angeles, Honorable Sunshine Sykes, presiding;

• *Rodriguez v. Scott A. Humphreys, Inc.*, Case No. 30-2021-01184556-CU-OE-CXC, California Superior Court, County of Ventura, Honorable Matthew P. Guasco, presiding;

• *Torres v. Primal Pet Foods, Inc.* Case No. FCS054783, California Superior Court, County of Solano, Honorable Wendy G. Getty, presiding;

• *Hanson v. Zapata Nuccio, Inc.,* Case No. 20STCV28951, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle, presiding;

• *Molina v. Avibank Mfg, Inc.,* Case No. 20STCV03910, California Superior Court, County of Los Angeles, Honorable John P. Doyle, presiding;

• *Cetina v. Lawry's Restaurants, Inc.,* Case No. 19STCV05201, California Superior Court, County of Los Angeles, Honorable Amy D. Hogue, presiding;

• *Luna v. Pronto California General Agency, LLC,* Case No. 19STCV39951, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle, presiding;

• *Alvarez v. Kazak-Mars, Inc.,* Case No. 20STCV42587, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle, presiding;

• *Noe v. My Pillow, Inc.* Case No. CIVDS 2011360, California Superior Court, County of San Bernardino, Honorable David Cohn, presiding;

• *Nunez v. 2751 West Coast Acquisition Company*, Case No. 30-2020-01145215-CU-OE-CXC, California Superior Court, County, County of Orange, Honorable Randall J. Sherman, Presiding;

• *Smith v. McMillen Enterprises, Inc.*, Case No. CV-20-002938, California Superior Court, County of Stanislaus, Honorable John R. Mayne, presiding;

• *Turner v. Plant Prefab Inc., et al..*, Case No. CIVDS2017517, California Superior Court, County of San Bernardino, Honorable David Cohn, presiding;

• *Duran v. Fresh Select, LLC,* Case No. VCU284892, California Superior Court, County of Tulare, Honorable Bret Hillman, presiding;

• *Reynoso, et al. v. Cream of the Crop AG Service, Inc.,* Case No. VCU278847, California Superior Court, County of Tulare, Honorable Bret Hillman, presiding;

• *Michel v. Universal Waste Systems, Inc.*, Case No. 19STCV46181, California Superior Court, County of Los Angeles, Honorable David S. Cunningham presiding;

• *Jungers v. U.S. Borax Inc., et al.,* Case No. BCV-21-10003, California Superior Court, County of Kern, Honorable Bernard C. Barmann Jr. presiding;

• *Fortune v. Amoroso Limited Partnership, et al..,* Case No. 20STCV25874, California Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;

• *Montoya, et al. v. Remo, Inc.* Case No. 20STCV34614, California Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;

• *Rincon, et al. v. New-Indy Tripaq, LLC, et al..* Case No. 20STCV17118, California

Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;

- *De Leon, et al. v. Wismettac Asian Foods, Inc.* Case No. 19STCV18172, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
- *Tapia v. Mercer Foods, Inc.* Case No. CV-21-000020, California Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;
- *Molina v. Reser's Fine Foods, Inc.* Case No. 37-2021-00013052-CU-OECTL, California Superior Court, County of San Diego, Honorable Eddie C. Sturgeon presiding;
- *Reyes v. Imperial Sprinkler Supply, Inc.* Case No. 30-2020-01167748-CU-OE-CXC, California Superior Court, County of Los Angeles, Honorable Peter Wilson presiding;
- *Zavala, et al. v. PLS Check Cashers, Inc.* Case No. 20STCV42586, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
- *Paz v. Hill Brothers Chemical Company.* Case No. 20STCV48279, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
- *Garcia v. Inwesco Incorporated.* Case No. 20STCV46833, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
- *Guevara v. J&K Culver, LLC, et al.* Case No. 19STCV39951, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
- *Hamilton v. Michael Kors Stores, Inc. et al.,* Case No. 19STCV37061, California Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;
- *Arzooian v. A&M Administration, LLC, et al.* Case No. 21STCV05576, California Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;
- *Santos, et al. v. Maruzen of America, Inc.,* Case No. 19STCV37662, California Superior Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;
- *Schaffino v. M.O. Dion & Sons., Inc., et al.,* Case No. 20STCV38023, California Superior Court, County of Los Angeles, Honorable Gail Killefer presiding;
- *Moreno v. Santa Paula Post Acute, LLC, et al.* Case No. 21STCV12533, California Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;
- *Singer v. Desert Area Resources and Training,* Case No. BCV-21-101093, California

Superior Court, County of Kern, Honorable Thomas S. Clark presiding;

• *Clarizio v. Guard-Systems, Inc.,* Case No. 21STCV28667, California Superior Court, County of Los Angeles, Honorable Armen Tamzarian presiding;

• *Guzman v. Freschco Painters, Inc.,* Case No. 21STCV04683, California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

• *Koutny v. PAE Aviation and Technical Services, LLC,* Case No. 21C-0106, California Superior Court, County of Kings, Honorable Melissa R. D'Morias presiding;

• *Rodriguez v. Pacifica Trucks, LLC,* Case No. 20STCV37576, California Superior Court, County of Los Angeles, Honorable Stuart Rice presiding;

• *Ramos v. AEGIS Treatment Centers, LLC,* Case No. 20STCV41429, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;

• *Valdez v. Integrated Building Services, Inc.* Case No. 20STCV37793, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;

• *Harris v. America One Security, Inc.* Case No. 21STCV01399, California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

• *Moreno v. M&J Seafood Company, Inc.* Case No. 22STCV03341, California Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;

• *Corrales v. Q&B Foods, Inc.* Case No. 20STCV40885, California Superior Court, County of Los Angeles, Honorable Elihu Berle presiding;

• *Arteaga v. Demolition Specialist, Inc.* Case No. RIC2001133, California Superior Court, County of Riverside, Honorable Harold Hopp presiding;

• *Vigil, et al. v. Capstone Turbine Corporation,* Case No. 20STCV32123, California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

• *Ramirez v. Sea-Win, Inc.* Case No. 21STCV22026, California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

• *Ortega Chavez v. Winpak Lane, Inc.* Case No. CIVSB2207313, California Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;

• *Garcia v. American Licorice Company.* Case No. RG21107049, California Superior

Court, County of Alameda, Honorable Brad Seligman presiding;

• *Madrono v. Vitale Nursing, Inc, et al.,* Case No. 21STCV09845, California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

• *Orellana v. Advanced Building Maintenance.* Case No. 34-2020-00286791-CU-OE-GDS, California Superior Court, County of Sacramento, Honorable Jill Talley presiding.

• *Aguilar v. Bioness, Inc., et al., Case* No. 21STCV41702, California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

• *Antoine v. Pinky Beverly Hills, LLC., et al. Case No. 19STCV44856,* California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

• *Phambui v. Fashion Marketing and Merchandising Group, Inc., et al. Case No. 21STCV06634,* Superior Court, County of Los Angeles, Honorable Stuart M. Rice presiding;

• *Ortega Chavez v. Winpak Lane, Inc., et al. Case No. CIVSB2202274,* California Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;

• *Carrasco v O.H. Barkhordar D.D.S., Inc., et al. Case No. 22STCV21188,* California Superior Court, County of Los Angeles, Honorable Lawrence Riff presiding;

• *Correia v. Gallo Glass Company, et al. Case No. CV-21-006459,* California Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;

• *Davis v. Beeline Import and Services, LLC, et al. Case No. CIVSB2119287,* California Superior Court, County of San Bernardino, Honorable David Cohn presiding;

• *Angel Lopez v Innovative Coatings Technology Corporation dba Incotec, et al. Case No. 30-2020-01173245-CU-OE-CXC,* California Superior Court, County of Orange, Honorable Lon Hurwitz presiding;

• *Lopez v UPM, Inc., et al. Case No. 20STCV36695,* California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

• *Moreno v. Infiniti Group LLC*., et al. Case No. CIVSB2223551, California Superior Court, County of San Bernardino, Honorable Joseph T. Ortiz presiding;

• *Kelley v. Applus Technologies, Inc., et al. Case No. CIVSB2204889,* California Superior Court, County of San Bernardino, honorable Jessica Morgan presiding;

- *Hernandez v Bromley Foods, Inc., et al. Case No. 56-2021-00561326-CU-OE-VTA*, California Superior Court, County of Ventura, Honorable Henr Walsh presiding;
- *Heredia v. Alan Smith Pool Plastering, Inc., et al. Case No. 30-2020-01163609-CU-OE-CXC*, California Superior Court, County of Orange, Honorable Randall J. Sherman presiding;
- *Martinez Guzman v Freshco Painters Inc., et al. Case No. 21STCV04683,* California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
- *Gomez Mireles v. USG Ceilings Plus, LLC., et al. Case No. 21STCV45606*, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
- *Garzon v. Mobile Hi-Tech Wheels, LLC., et al., Case No. 21STCV15396*, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
- *Dethrasavong v. ASI Computer Technologies, Inc., et al.* Case No. 20STCV32312, California Superior Court, County of Contra Costa, Honorable Kenneth R. Freeman presiding;
- *Lopez v. Waldorf Astoria Management LLC., et al.* Case No. 20STCV17212, California Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;
- *Viveros v. Mission Produce, Inc., et al.* Case No. 20STCV15737, California Superior Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;
- *Flores v. United Maintenance Company, Inc.,* et al. Case No. 21STCV07008, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
- *Blandi v. Francesca Restaurant, LLC., et al.* Case No. 37-2022-00049034-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Marcella O. McLaughling presiding;
- *Lopez Cabrera v. South Valley Almond Company, LLC, et al.* Case No. BCV-2-100722, California Superior Court, County of Kern, Honorable Bernard C. Barmann, Jr. presiding;
- Guillermo Cruz v. Alma Family Serives, et al. Case No. 21STCV18156, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
- *Davood v. NKSFB, LLC, et al.* Case No. 22STCV17305, California Superior Court, County of Los Angeles, Honorable Christopher K. Lui presiding;
- *Ferrer v. Ineos USA, LLC., et al.,* Case No. 21STCV28076, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;

- *Portillo Sanchez v. Paragon Services Janitorial Orange County, LLC, et al.* Case No. 20STCV38562, California Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;
- *Trigueros Garcia v. Highland Plastics, Inc., et al.,* Case No. CVRI2202836, California Superior Court, County of Riverside, Honorable Harold Hopp presiding;
- *Magana Ramirez v. 360 Support Services, et al.* Case No. 22STCV20456, California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
- *Morales v. Baldy's Restaurant Group, LLC.,* et al. Case No. 20STCV36535, California Superior Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;
- *Gonzales v. El Monte Rents, Inc., et al.* Case No. 21STCV10209, California Superior Court, County of Los Angeles, Honorable Stuart M. Rice presiding;
- *Gonzalez v. Total Education Solutions, Inc., et al.* Case No. 20STCV37984, California Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;
- *Helaire v. Smithfield Packaged Meats Corp, et al.* Case No. JCCP5244, California Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;*Hernandez v. Central Valley Recovery Services, et al.* Case No. VCU290220, California Superior Court, County of Tulare, Honorable Brett Hillman presiding;
- *Hernandez v. SC Commercial, LLC, et al.* Case No. 30-2020-01166961-CU-OE-CXC, California Superior Court, County of Orange, Honorable Lon Hurwitz presiding;
- *Hines v. Constellis Integrated Risk Management Services, et al.* Case No. 20STCV26962, California Superior Court, County of Los Angeles, Honorable Christopher K. Lui presiding;
- *Moya v. Valassis Direct Mail, Inc., et al.* Case No. 21STCV09412, California Superior Court, County of Los Angeles, Honorable Stuart Rice presiding;
- *Jordan v. The Martin-Brower Company, LLC, et al.,* Case No. 21STCV41435, California Superior Court, County of Los Angeles, honorable Stuart Rice presiding;
- *Juarez v. Calmet Services, Inc., et al.* Case No. 21STCV33668, California Superior Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding*;*

- *Mcintosh v. WWL Vehicle Services Americas Inc., et al.* Case No. 56-2022-00562544-CU-OE-VTA, California Superior Court, County of Ventura, Honorable Benjamin Coats presiding;
- *Mendoza v. Amusement Industry, Inc., et al.* Case No. 21STCV09790, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
- *Moore v. Dnata US Inflight Catering LLC, et al.* Case No. CGC-20-586512, California Superior Court, County of San Francisco, Honorable Curtis Karnow presiding;
- *Peterson v. Sorenson Engineering, Inc., et al.* Case No. CIVDS2023994, California Superior Court, County of San Bernardino, Honorable David Cohn presiding;
- *Torres v. Laurel Avenue, LLC, et al.* Case No. CIVSB2202708, California Superior Court, County of San Bernardino, Honorable David Cohn presiding;
- *Nunley v. Cardinal Logistics Management Corporation et al.* Case No. CIVSB2210430, California Superior Court, County of San Bernardino, Honorable Joseph T. Ortiz presiding;
- *Pastrana v. National Sign & Marketing Corporation et al.* Case No. CIVSB2118749, California Superior Court, County of San Bernardino, Honorable David Cohn presiding;
- *Pineda v. Grand Life, Inc., et al.* Case No. 21STCV28066, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
- *Pattingale v.* Laird Family Estate, LLC et al. Case No. 22CV000048, California Superior Court, County of Napa, Honorable Cynthia P. Smith presiding;
- *Ramirez v. Sea Win, Inc., et al.* Case No. 21STCV22026, California Superior Court, County of Los Angeles, Honorable Lawerence P. Riff presiding;
- *Reategui v. Cal Building & Maintenance Industries, Inc.,* Case No. 20STCV39648, California Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;
- *Rodriguez v. ACRA Aerospace, LLC, et al.* Case No. 30-2020-01171360-CU-OE-CXC, California Superior Court, County of Orange, Honorable Randall J. Sherman presiding;
- *Rodriguez v. Ultra Pro International LLC, et al.* Case No. 21STCV11250, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
- *Ruiz v. Kleen Harvest, Inc., et al.* Case No. 21CV002319, California Superior Court,

County of Monterey, Honorable Thomas W. Wills presiding;

- *Roberto Ruiz v. Protech Delivery and Installation et al.* Case No. 21STCV07001, California Superior Court, County of Los Angeles, Honorable Stuart M. Rice presiding;
- *Russell v. CIMC Reefer Trailer, Inc., et al.* Case No. RIC2001777, California Superior Court, County of Riverside, Honorable Harld Hopp presiding;
- *Russell v. Staffmark Investment LLC, et al.* Case No. CVRI12103921, California Superior Court, County of Riverside, Honorable Harold Hopp presiding;
- *Quintanilla et al. v. Chrome Hearts LLC, et al.* Case No. 21STCV43180, California Superior Court, County of Los Angeles, Honorable Elihu B. Berle presiding;
- *Taat v. Acell, Inc., et al.* Case No. 37-2022-00005437-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Matthew C. Braner presiding;
- *Todd v. Motivate, LLC, et al.* Case No. CGC-23-605052, California Superior Court, County of San Francisco, Honorable Anne- Christine Massullo presiding;
- *Turner Sr., v. The Sidewalk Café, Inc., et al.* Case No. 21STCV10154, California Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;
- *Vargas-Flores v. Harbor Bay Club, Inc., et al.* Case No. 21CV002396, California Superior Court, County of Alameda, Honorable Michael Markman presiding;
- *Vasquez v. Liquid Technologies, Inc., et al.* Case No. CIVDS2023892, California Superior Court, County of San Bernardino, Honorable Joseph Ortiz presiding;
- *Vasquez et al. v. Kingswood LLC, et al.,* Case No. 20STCV32123, California Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
- *Sandoval Villafana v. Satco, Inc., et al.* Case No. 21STCV17085, California Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;
- *Williams v. Marrs Services, Inc., et al.* Case No. 21STCV23775, California Superior Court, County of Los Angeles, Honorable Stuart M. Stuart presiding;
- *Low v. Triple Canopy, Inc., et al.* Case No. 37-2023-0007078-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Carolyn Caietti presiding;
- *Camacho v. Premium Electric Corp, et al.* Case No. 22STCV26878, California Superior

Court, County of Los Angeles, Honorable David S. Cunningham presiding;

- *Lopez v. Bachem Americas, Inc., et al.* Case No. 23STCV04258, California Superior Court, County of Los Angeles, Honorable Laura Seigle presiding;
- *Mendoza Cendejas v. E. & J. Gallo Winery, et al.* Case No. CV-22-005396, California Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;
- *Romero v. Armstrong Installation Service, et al.* Case No. 22CV022519, California Superior Court, County of Alameda, Honorable Noel Wise presiding;
- *Perez v. D&G Restaurants, LLC, et al.* Case No. 30-2021-01209638-CU-OE-CXC, California Superior Court, County of Orange, Honorable Peter Wilson presiding;
- *Sarmiento, et al. v. Neil Jones Food Company* Case No. 21CECG03825, California Superior Court, County of Fresno, Hon. Kristi Culver Kapetan presiding;
- *Garcia v. Nature Fresh Farms, LLC, et al.* Case No. ECU001961, California Superior Court, County of Imperial, Honorable Jeffery B. Jones presiding;
- *Machuca v. Charleys Philly Steaks, et al.* Case No. FCS057713, California Superior Court, County of Solano, Hon. Christine A. Carringer presiding;
- *Machuca v. Charleys Philly Steaks, et al.* Case No. FCS058064, California Superior Court, County of Solano, Hon. Christine A. Carringer presiding;
- *Olivares v. PCI Industries, LLC, et al.* Case No. 22STCV37965, California Superior Court, County of Los Angeles, Hon. Samantha P. Jessner presiding;
- *Robles v. FM Mexican Grill Inc., et al.* Case No. BC716450, California Superior Court, County of Los Angeles, Hon. Daniel J. Buckley presiding;
- *Sarmiento v. The Neil Jones Food Company*., et al. Case No. 21CECG03825, California Superior Court, County of Fresno, Hon. Kristi Culver Kapetan presiding;
- *Jimenez v. Route 66, Post Acute LLC Agency, LLC., et al.* Case No. 23STCV03441, California Superior Court, County of Los Angeles, Hon. Laura A. Seigle presiding;
- *Diaz v. UCA General Insurance Services, Inc., et al.* Case No. 30-2021-01185227-CU-OE-CXC, California Superior Court, County of Orange, Hon. Randall J. Sherman presiding;
- *Moctezuma v. Direct Line Global, LLC., et al.* Case No. 23CV033075, California

Superior Court, County of Alameda, Hon. Michael Markman presiding;

- *Williams v. Fortec Medical, Inc., et al*. Case No. 22CV014116, California Superior Court, County of Alameda, Hon. Michael Markman presiding;
- *Franco et al. v. Inland Behavioral and Health Services et al.* Case No. CIVSB2118579, California Superior Court, County of San Bernardino, Hon. Christian Towns presiding;
- *Arballo et al. v. California Custom Fruits and Flavors, Inc., et al.* Case No. 22STCV35657, California Superior Court, County of Los Angeles, Hon. Elihu Berle presiding;
- *Henderson v. Bizon Group, Inc., et al.* Case No. HG21115170, California Superior Court, County of Alameda, Hon. Noel Wise presiding;
- *Boothe et al. v. Lemonade Restaurant Group, LLC, et al.* Case No. 22STCV38302, California Superior Court, County of Los Angeles, Hon. Laura Seigle presiding;
- *Montoya et al. v. FPR II, L.L.C., et al.* Case No. 22CV404499, California Superior Court, County of Santa Clara, Hon. Theodore C. Zayner;
- *Martinez Flores v. APT Maintenance, Inc., et al.,* Case No. 22CV024427, California Superior Court, County of Alameda, Honorable Somnath Raj Chatterjee presiding;
- *Montoya v. TLMVACO LLC., et al.,* Case No. 23CV001593, California Superior Court, County of Monterey, Honorable Thomas W. Willis presiding;
- *Getaw v. Consolidated Disposal Services LLC., et al*., Case No. 21STCV22036, California Superior Court, County of Los Angeles, Honorable Elihu Berle presiding;
- *Barocio v. Industrial Field Services Inc., et al.,* Case No. 23STCV01522, California Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;
- *Mostafa Gad v. St. George Auto Sales, Inc., et al.,* Case No. 30-2019-01058127-CU-OE-CXC, California Superior Court, County of Orange, Honorable Lon F. Hurwitz presiding;
- *Federics v. The HWood Group, LLC., et al.,* Case No. 21STCV44105, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
- *Deaver v. Blue Diamond Growers, et al.,* Case No. 34-2022-00316490-CU-OE-GDS, California Superior Court, County of Sacramento, Honorable Lauri A. Damrell presiding;
- *Rosa v. Paqueteria HR Express, Inc., et al.,* Case No. 23STCV00890, California

Superior Court, County of Los Angeles, Honorable Theresa M. Traber presiding;

- *Martnez v. Kenyon Plastering, Inc., et al.,* Case No. CIVSB2216155, California Superior Court, County of San Bernardino, Honorable Christian Towns presiding;
- *Mora v. IGT Global Solutions Corporation, et al.,* Case No. 22STCV05393, California Superior Court, County of Los Angeles, Honorable Timothy Patrick Dillon presiding;
- *Zuniga v. House Foods America Corporation, et al.,* Case No. 8:22-cv-00372-JWH-JDEx, California State Court, County of Orange, Honorable John W. Holcomb presiding;
- *Ramirez v. Primez Farms LLC, et al.,* Case No. 20STCV06328, California Superior Court, County of Los Angeles, Honorable Elaine Lu presiding;
- *Pacheco v. JCC Logistics, Inc., et al.,* Case No. B-21-102266, California Superior Court, County of Kern, Honorable Thomas Clark presiding;
- *Caballero v. The Ensign Group, Inc., et al.,* Case No. 19STCV43230, California Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;
- *Graciano v. Hignell, Incorporated, et al.,* Case No. 22CV01196, California Superior Court, County of Butte, Honorable Stephen E. Benson presiding;
- *Ruiz v. Butterfield Electric, Inc., et al,* Case No. 22CV010662, California Superior Court, County of Alameda, Honorable Michael Markman presiding;
- *Lozano v. LECC Berg Feinfield Eye Centers, LLC., et al.,* Case No. 22STCV40646, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
- *Villalpando et al. v. Los Angeles Truck Service, LLC, et al.,* Case No. 22STCV11804, California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
- *Pablo Martinez v. Superior Cattle Feeders, LLC, et al.,* Case No. ECU002635, California Superior Court, County of Imperial, Honorable Brooks Anderhold presiding;
- *Milon v David & Esperanza Chavez Family Limited Partnership DBA Chavez Supermarket et al.*, Case No. 20CV368379, California Superior Court, County of Santa Clara, Honorable Theodore C. Zayner presiding;
- *Flores et al. v. Parkwood Landscape Maintenance Inc., et al.,* Case No.: 20STCV12795, California Superior Court, County of Los Angeles, Honorable Stuart Rice presiding;

• *Williams v. Holland Partner Group Operations, LLC, et al.,* Case No.: 23CV049392, California Superior Court, County of Alameda, Honorable Sarah Standford-Smith presiding;

• *Estrada v Cookunity Inc., et al.,* Case No.: 24STCV12367, California Superior Court, County of Los Angeles, Honorable Laura A. Seigle presiding;

• *Silvas v. Catalyst Family, Inc.,* Case No.: 21CV385134, California Superior Court, County of Santa Clara, Honorable Charles F. Adams presiding;

• *Arnett v. Traditions Health LLC*, Case No.: CVRI2305219, California Superior Court, County of Riverside, Honorable Harold W. Hopp presiding;

• Gammaro v. Walgreen Pharmacy Services Midwest, LLC, Case No.: 23STCV00615, California Superior Court, County of Los Angeles, Honorable Daniel M. Crowley;

• *Montoya v. Beauty 21 Cosmetics, Inc*., Case No.: CIVSB2314841, California Superior Court, County of San Bernardino, Honorable Joseph T. Ortiz presiding; and

• *Santos Martinez et al. v. Le Zinc Bar LLC*, Case No.: 22STCV09367, California Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding.

13. I have also settled matters on a "PAGA Only" basis for aggrieved employees in the past, including in:

• *Flores v. Delta Apparel, Inc.*, Case No. BC641499, California Superior Court, County of Los Angeles, Honorable Daniel J. Buckley, presiding;

• *Segura v. CJ Foods Service Holdings USA, LLC*, Case No. 19STCV24918, California Superior Court, County of Los Angeles, Honorable Maureen Duffy-Lewis, presiding;

• *Sierra v. Nexem-Allied, LLC*, Case No. 20STCV11281, California Superior Court, County of Los Angeles, Honorable Randolph M. Hammock, presiding;

• *Nodal v. Sodexo, Inc.,* Case No. 20STCV40601, California Superior Court, County of Los Angeles, Honorable Lawrence Riff, presiding; and

• *Cooper v. Lucas Health Partners,* Case No. 20STCV20050, California Superior Court, County of Los Angeles, Honorable Maren Nelson, presiding;

• *Herrera v. Greystar Management, LP, et al.,* Case No. 37-2020-00009672-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Carolyn Caietti, presiding;

- *Slater v. Jo-Ann Stores, LLC.,* Case No. 21STCV18454, California Superior Court, County of Los Angeles, Honorable Maurice A. Leiter, presiding;
- *Bolanos v. Canoga Park Heating & Air Conditioning, Co., Inc.,* Case No. 21STCV12674, California Superior Court, County of Los Angeles, Honorable Yolanda Orozco, presiding;
- *Granados v. Cosmetic Ideas, Inc.* Case No. 21STCV10797, California Superior Court, County of Los Angeles, Honorable Richard L. Fruin, presiding;
- *Ruano v. DPC Woodwork, Inc.* Case No. 21STCV00408, California Superior Court, County of Los Angeles, Honorable Jon R. Takasugi presiding;
- *Hardy v. Texas Roadhouse Management Corp., et al. Case No. CIVSB2222259,* California Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;
- *Iraheta v Legacy Farmers, Inc., et al. Case No. MSC21-00762,* California Superior Court, County of Los Angeles, Honorable Charles S. Treat presiding;
- *Landin v Central Janitors' Supply Co., Inc., et al. Case No. CV-21-006391*, California Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;
- *Bailey v. Cannon Constructors, et al.* Case No. 21STCV38274, California Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;
- *Johns, et al. v. Whelan Security of California, Inc., et al.* Case No. 22STCV68687, California Superior Court, County of Los Angeles, Honorable Laura Seigle presiding;
- *Carrion v. Clutter, Inc., et al.* Case No. 23STCV06709, California Superior Court, County of Los Angeles, Honorable Kerry Bensinger presiding;
- *Delia v. The Irvine Company, LLC, et al.* Case No. 30-2019-01050823-CU-OE-CXC, California Superior Court, County of Orange, Honorable William D. Claster presiding;
- *Landin v. Central Janitor's Supply Co., Inc., et al.* Case No. CV-21-006391, California Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;
- *German Vaca et al.*, *v. California Pizza Kitchen, Inc*., et al. Case No. 30-2022-01278828-CU-OE-CXC, California Superior Court, County of Orange, Honorable Randall Sherman presiding;
- *London Young v. Amazon.com LLC, et al.* Case No. 21STCV38280, California Superior

Court, County of Los Angeles, Honorable Elaine Lu presiding;

- *Martinez v. Dick's Sporting Goods, Inc., et al. Case No. 22STCV17283, California Superior Court, County of Los Angeles, Honorable Armen Tamzarian presiding;*
- *Latrice Ackles v. Brinker Restaurant Corporation, et al*. Case No. 22STCV19068, California Superior Court, County of Los Angeles, Honorable Gail Killefer presiding;
- *Ruiz v. Edelbrock Foundry, LLC, et al.* Case No. 20STCV19057, California Superior Court, County of Los Angeles, Honorable David S. Cunningham presiding.
- *Bey v. Holliday Rock Co., Inc., et al.* Case No. CIVSB2316000, California Superior Court, County of San Bernardino, Honorable Kory Mathewson presiding;
- *Ruvalcaba v. Rod Fraser Enterprises, Inc., et al.* Case No. 30-2023-01308022-CU-OE-CXC, California Superior Court, County of Orange, Hon. Layne H. Melzer presiding;
- *Rhea et al. v. Stars behavioral health Group, Inc., et al.* Case No. CIVDS2017661, California Superior Court, County of San Bernardino, Hon. Joseph T. Ortiz presiding;
- *Franco et al. v. Golden Queen Mining Company, LLC, et al,* Case No. BCV-23-102813, California Superior Court, County of Kern, Hon. T. Mark Smith presiding;
- *Ledesma v. Connell Chevrolet et al.* Case No. 30-2021-01210019-CU-OE-CXC, California Superior Court, County of Orange, Honorable William Claster presiding;
- *Essary v. Community Corporation of Santa Monica, et al.* Case No. 23STCV03250, California Superior Court, County of Los Angeles, Honorable Samantha Jessner presiding;
- *Nestor et al., v. Redlands Community Hospital, et al.* Case No. CIVSB2327089, California Superior Court, County of San Bernardino, Honorable Wilfred J. Schneider, Jr. presiding;
- *Azzawi v. C-Store Services, Inc., et al.* Case No. CIVSBZ228712, California Superior Court, County of San Bernardino, Honorable Joseph B. Wildman presiding;
- *Quintero v MW BHCC LLC, et al.* Case No. 22STCV32539, California Superior Court, County of Los Angeles, Honorable Rice Stuart presiding;
- *Mendivil v. HG Foods, LLC,* Case No.: VCU296223, California Superior Court, County of Tulare, Honorable Gary M. Johnson presiding; and

Barron De Expinoza v. Silicon Resourcing Solutions, LLC., Case No.: 2023CUOE010215, California Superior Court, County of Ventura, Honorable Maureen M. Houska presiding

14. In sum, I am experienced and qualified to evaluate the Class Members' claims and viability of Defendants' defenses, as are the other members of my Firm, past and present.

15. Vedang J. Patel has been a member of my law firm for over four (4) years and served as class counsel on numerous actions on which I was also named class counsel. Prior to working with Bibiyan Law Group, P.C., he practiced law with Murchison & Cumming, LLP on a variety of matter on behalf of defendants. Thereafter, he joined Bibiyan Law Group, P.C., practicing law on behalf of plaintiffs in matters of employment law, and specifically on issue of unpaid wages and class action settlements. He is currently a Partner at Bibiyan Law Group, P.C., and head of the Settlement Department. Among other tasks, he oversaw and managed all settlements at Bibiyan Law Group, P.C. for years. He also oversaw several attorneys, paralegals, and legal assistants and had overseen the settlement of over one hundred (100) class and PAGA matters while with our office;

16. Currently, my firm is acting as counsel in tens of wage and hour class actions and representative PAGA actions.

17. Class Counsel believe no conflicts, disabling or otherwise, exists between Plaintiff and Class Members because Plaintiff alleges to have been damaged by the same alleged conduct of Defendant (i.e., Plaintiff is classified as non-exempt, hourly paid employee, not paid premium pay, etc.) and thus has the incentive to fairly represent all Class Members' claims to achieve the maximum possible recovery.

18. After a thorough investigation and settlement discussions, Class Counsel arrived at terms that they viewed was in the best interest of both the Class Members and the Parties.

19. Should the Court refuse to grant preliminary approval of this Settlement, many of the Class Members may be denied any recourse for Defendants' alleged violations.

20. For these reasons, as well as the reasons provided in the Declaration of Keaton D. Mendoza, I believe that Class Counsel are sufficiently experienced and qualified to evaluate the Class Members' claims and viability of Defendants' defenses.

21. I believe, and as further set out in the Declaration of Keaton D. Mendoza, the settlement presented here only resulted after having engaged in extensive informal discovery and investigation and is the product of hard-fought litigation and extensive arm's-length negotiations.

22. I believe, based on my experience as class counsel, that the settlement is fair, reasonable, adequate and in the best interests of class members.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct this October 23, 2026, at Los Angeles, California.

/s/ David D. Bibiyan
David D. Bibiyan