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Attorneys for MATTHEW BAUMANN, on behalf of himself,
all others similarly situated, and on behalf of the general public

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

MATTHEW BAUMANN, on behalf of
himself, all others similarly situated, and
on behalf of the general public,

Plaintiffs,

v.

ATP INVESTMENT COMPANY, LLC
DBA AUDI FLETCHER JONES ; and
DOES 1-100,

Defendants.

Case No. 30-2024-01427099-CU-OE-CXC

*[Assigned for all purposes to the Honorable William
Claster, Dept. CX101]*

**DECLARATION OF PLAINTIFF MATTHEW
BAUMANN IN SUPPORT OF SETTLEMENT
APPROVAL**

Complaint Filed: September 23, 2024
Trial Date: None Set

I, MATTHEW BAUMANN, hereby declare under penalty of perjury as follows:

1. I have personal knowledge of all matters stated herein, and if called as a witness, I could and would competently testify thereto, except as to those matters stated upon information and belief, and as to those matters, I believe them to be true.
2. I am the named Plaintiff in the above-captioned lawsuit, and I submit this declaration in support of settlement approval.
3. I worked for ATP Investment Company, LLC dba Audi Fletcher Jones (“Audi”) as an automotive service technician/mechanic. I worked for Audi from approximately March 28, 2018, to approximately September 4, 2020, and again from approximately November 1, 2021, and was employed by Audi when I submitted my PAGA notice to the LWDA. After submitting my PAGA notice to the LWDA, my employment ended on or about August 16, 2024.
4. I originally decided to contact an attorney because I felt that some of Audi’s policies and practices violated the law.
5. Since filing this case, I diligently worked on this case. I have been in regular contact with my attorneys throughout the prosecution of this case and have been kept apprised of all aspects of the case. Throughout the litigation, I have always been available to provide my attorneys with helpful information for this lawsuit.
6. I always answered phone calls from my attorneys or called them back promptly when they called. I also promptly responded to emails sent by my attorneys. On many occasions, I spoke with my attorneys for case related purposes.
7. At the beginning of the case, I searched for and provided my attorneys with documents I received from Audi, such as my paycheck stubs; screen shots of my timecards; documents showing my flag hours; Audi’s employee handbooks; Audi’s alcohol and drug policy; Audi’s cellular phone policy; Audi’s computer, e-mail, voicemail, and internet policy; Audi’s confidentiality agreement; Audi’s meal and rest period policies; Audi’s paid vacation and sick leave policy; Audi’s personal appearance and behavior policy; Audi’s

parking policy; Audi's social media policy; Audi's dealership trade secrets and confidential information policy; and Audi's technician pay plan.

8. I also searched for and provided my attorneys with emails from my employment, such as emails from Audi's Human Resources representative.

9. Although I did not attend the mediation in person, I was available by phone. I gave my consent to settle with Audi for the gross settlement amount of \$135,500, which I find to be fair and reasonable.

10. I completely and carefully reviewed the settlement agreement. I then signed the settlement agreement.

11. I estimate that I spent approximately 50 hours in prosecuting this case.

12. I initiated this lawsuit on behalf of myself and the other aggrieved employees because I wanted to fix what I perceived as problems affecting all of us. From the very beginning, I understood that I was participating in this case, not only for my own benefit, but for the many past and present employees.

13. While I truly believe that I was doing the right thing in pursuing this case, I do believe that I have paid a price for the greater good of other employees, who will now obtain some relief through the terms of the proposed settlement.

14. In light of the work I performed in this case and the duties associated with being the named plaintiff in a case of this magnitude, I believe the \$2,500 PAGA representative payment request is reasonable. I understand that this additional award is not guaranteed and is subject to Court approval.

15. I have and will continue to adequately represent all of the interests of the Aggrieved Employees. I will treat the interests of the Aggrieved Employees above my own interests.

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

Dated: 10/6/2025

DocuSigned by:
Matthew Baumann
10924987C04400
MATTHEW BAUMANN