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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA

STEVEN JOSEPH THOMAS,
individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

BOYS & GIRLS CLUB OF SOUTH
SAN LUIS OBISPO COUNTY; BOYS &
GIRLS CLUBS OF THE CENTRAL
COAST; UNITED BOYS AND GIRLS
CLUBS OF SANTA BARBARA
COUNTY; and DOES 1 to 50, inclusive

**DECLARATION OF STEVEN JOSEPH
THOMAS IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Case No.: 24CV03448

Date: March 6, 2026
Time: 10:00 am
Dept.: 4

Honorable Donna D. Geck

Filed Concurrently with; Declaration of Adrian
Bacon; Memorandum of Points and Authorities
; Proposed Order

DECLARATION OF STEVEN JOSEPH THOMAS

I, Steven Thomas, declare:

1. I am the named plaintiff in this action. I have personal knowledge of the following facts and, if called upon as a witness, could and would competently testify thereto, except as to those matters which are explicitly set forth as based upon my information and belief and, as to such matters, I am informed and believe they are true and correct.

1 2. I am writing this declaration in support of Plaintiff's Motion for Preliminary
2 Approval in the above-captioned action.

3 3. My attorneys have informed me of the responsibilities of a class representative. I
4 understand these responsibilities and am willing and prepared to put the interest of the class
5 members before my own. Throughout this case, I believe that I served as an adequate class
6 representative. I worked with my attorneys throughout the case, assisting in discovery that was
7 served on me, and assisting in drafting the complaint. I also regularly discussed the case with
8 my attorneys when they had questions, and also participated in the settlement discussions, by
9 speaking with my attorneys about the status of settlement discussions, participating in mediation,
10 and providing documents for my attorneys to advance the interests of the Class Members. I also
11 reviewed the settlement agreements in this case and had several discussions with my attorneys
12 regarding settlement on behalf of the class in my role as a class representative.

13 4. My best estimate is that I spent approximately 25-30 hours of my time in
14 connection with this case to date. The activities I have performed have included, but have not
15 been limited to: obtaining legal counsel, numerous telephone conversations with my attorneys,
16 numerous emails with my attorneys, gathering documents relating to the wage and hour practices
17 of Defendant for my attorneys, reviewing documents with my attorneys and assisting them in
18 developing the claims in this case, being actively involved in the settlement process including
19 mediation, to ensure a fair result for the Class as a whole, and spending time carefully reviewing
20 the Settlement, and other case related documents on my own and with my attorneys to make sure
21 that Settlement and the other work my attorneys performed are in the best interests of the Class.

22 5. I also understand that my attorneys have submitted an application to this Court for
23 an Incentive Award to compensate me for my unique contributions to the success of this action
24 in the amount of \$10,000. I believe this amount is fair and reasonable compensation for my
25 efforts in this case and the risks I have taken in pursuing a fair recovery for the Class. There is
26 now a public record - this publicly filed lawsuit - that I served as a class representative in a wage
27 and hour class action lawsuit. Further, before I filed this case, my counsel also advised me of
28 the possibility that, if the case was lost, I could have been ordered to pay Defendant's costs,

1 which could have totaled tens of thousands of dollars, if not more, by the end.

2 6. For these reasons, I believe the Incentive Award requested is fair and reasonable.
3 I respectfully request the Court approve the Motion for Preliminary Approval, and the requested
4 Incentive Award.

5
6 I declare under penalty of perjury under the laws of California and the United States that
7 the foregoing is true and correct. Executed on October 29, 2025. .

8 Signed by:
9 Steven Joseph Thomas
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11 Steven Joseph Thomas
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