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Attorneys for Plaintiff TERRANCE OLIVER, on behalf of himself and other aggrieved employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

TERRANCE OLIVER, an individual; on behalf of himself and other aggrieved employees

Plaintiff,

v.

OFF DUTY OFFICERS INC., a California corporation; and DOES 1 through 100, inclusive,

Defendant.

CASE NO. 24CU013040C

[Assigned for all purposes to the Hon. Blaine K. Bowman - Dept. C-74]

DECLARATION OF TERRANCE OLIVER IN SUPPORT OF MOTION TO APPROVE PAGA SETTLEMENT

Date: March 5, 2027
Time: 8:30 a.m.
Dept.: C-74

Reservation No.: 106094

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DECLARATION OF TERRANCE OLIVER

I, TERRANCE OLIVER, declare as follows:

1. I am over the age of eighteen and am a named Plaintiff in *Terrance Oliver v. Off Duty Officers Inc. et al*. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto.

2. I submit this declaration in support of Plaintiff's Motion for Approval of Private Attorneys General Act Settlement Agreement.

3. I was previously employed by Defendant Off Duty Officers, Inc. ("Defendant") between 2021 and 2024 as a security guard. During my time working for Defendant, I was subjected to the same wage and hour policies and practices that are at issue in this case, including the Defendant's practice of failing to pay employees all wages owed, failing to provide meal periods, failing to authorize and permit rest periods, failing to provide accurate wage statements, and related issues.

4. For instance, along with other non-exempt employees, we worked off-the-clock without compensation, and we were unable to take duty-free meal periods or rest periods because the security guard posts did not allow us to take such breaks. These policies and practices affected all aggrieved employees.

5. Prior to getting involved in this case, I spoke with my attorneys for many hours to understand the nature of the case, and shared with my attorneys the wage and hour violations that I experienced over the years working for Defendant. After I became involved in this case, I assisted my attorneys in reviewing and understanding the numerous documents exchanged during informal discovery. I reviewed many of Defendant's policy documents with my attorneys, and answered my attorney's questions relating to those documents.

6. During the course of this case, I also connected my attorneys with potential witnesses who could assist in helping to support my claims for wage and hour violations. Moreover, during the informal discovery process, I assisted my attorneys with interpreting

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various documents produced, and to discussed with my attorneys strategies to ensure that the settlement was fair to all of the aggrieved employees.

7. I believe that this PAGA Settlement for $225,000 is a good result given the various issues involved with the case, and the recovery of penalties for the State of California and aggrieved employees is fair, reasonable and adequate.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 30, 2026.

DocuSigned by:
Terrance Oliver
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Terrance Oliver