

1 BLAKE R. BERTAGNA (SB# 273069)
2 blakebertagna@paulhastings.com
3 PAUL HASTINGS LLP
4 1920 Main Street, Suite 400
5 Irvine, California 92614
6 Telephone: (714) 668-6200
7 Facsimile: (714) 979-1921

8 Attorneys for Defendant
9 COMMUNITY TREE SERVICE, LLC

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF MONTEREY**

12 IGNACIO RIOS, as an individual and on
13 behalf of all others similarly situated,

14 Plaintiff,

15 vs.

16 COMMUNITY TREE SERVICE, LLC, a
17 California limited liability company; and
18 DOES 1 through 100, inclusive,

19 Defendant.

Lead Case No.: 24CV003969
Consolidated with Case No. 24CV005091

[Assigned for All Purposes to Hon. Ian A.
Rivamonte, Dept. 14]

**DECLARATION OF BLAKE R.
BERTAGNA ON BEHALF OF
DEFENDANT AND DEFENSE
COUNSEL IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL**

Date: July 24, 2026
Time: 8:30 a.m.
Dept.: 14

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

I, Blake R. Bertagna, declare:

1. I am an attorney at law duly licensed to practice before all of the California state courts. I am a Partner in the law firm of Paul Hastings LLP and counsel for Defendant Community Tree Service, LLC (“Defendant”) in this action. I am authorized to submit this declaration on behalf of Defendant and Defense Counsel for purposes of the conflict disclosures required in connection with Plaintiff’s motion for preliminary approval. I have personal knowledge of the matters set forth herein, except where stated on information obtained through my reasonable inquiry, including communications with Defendant’s representatives, and, if called upon to do so, I could and would testify competently to them.

2. The Settlement Agreement identifies Lines for Life, through its Construction Suicide Prevention Partnership, as the agreed-upon recipient of any funds represented by uncashed and cancelled settlement checks. I understand Lines for Life to be a nonprofit mental health awareness, support, and advocacy organization, and that the Construction Suicide Prevention Partnership focuses on suicide prevention, mental health education, and crisis-intervention resources for workers in construction, skilled trades, and related labor-intensive industries.

3. Neither Defendant, nor Paul Hastings LLP, nor any individual attorney representing Defendant in this action, has any interest or relationship, financial or otherwise, with Lines for Life or the Construction Suicide Prevention Partnership.

//

4. The Parties have selected Phoenix Settlement Administrators as the Settlement Administrator. Neither Defendant, nor Paul Hastings LLP, nor any individual attorney representing Defendant in this action, has any interest or relationship, financial or otherwise, with Phoenix Settlement Administrators, other than ordinary-course professional relationships, if any, arising from prior settlement administration matters.

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

Executed on June 16, 2026, at Irvine, California.

Blake Britagna

Blake R. Bertagna