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Attorneys for Plaintiff and the Putative Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN FRANCISCO

MARCUS TAYLOR, on behalf of himself and all others similarly situated,

Plaintiff,

v.

RODCO REDDING, LP, a California Limited Partnership; and DOES 1-50, inclusive.

Defendant.

CASE NO.: CGC-24-618334

DECLARATION OF MARCUS TAYLOR IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

HEARING INFORMATION

Date: Deecember 22, 2026
Time: 9:00 a.m.
Dept.: 304

Date and time has been pre-approved by clerk in Dept. 304

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DECLARATION OF MARCUS TAYLOR

I, Marcus Taylor**,** state and declare:

1. I am the Plaintiff in the above-captioned action and have personal knowledge of all matters stated herein, and could competently testify thereto. I make this declaration in support of the motion for preliminary approval of the class action settlement.

2. I worked for Defendant as a nonexempt Crew Member beginning on March 6, 2023.

3. Based on my participation in this litigation, discussions with counsel, and understanding of the strengths and weaknesses of the claims and defenses, I believe the settlement is fair, reasonable, and in the best interests of the class.

4. During my employment with Defendant, I became concerned about Defendant's meal and rest period practices, wage statements, payment of final wages, and reimbursement of necessary business expenses. I discussed these concerns with my attorneys and provided information about my experiences. Although I was concerned that bringing a lawsuit against my employer could affect future employment opportunities, I ultimately decided to pursue this action because I believed Defendant's practices harmed employees and should be challenged.

5. When I first retained my attorneys and chose to pursue this case on a class action basis, I understood that I had specific burdens as the "Class Representative," which included: (1) representing the interests of all Class Members; (2) placing the interests of the Class above my own; (3) actively participating in the litigation, including making myself available for deposition if required, and keeping generally aware of the status and progress of the lawsuit. Moreover, I understood that any resolution of the lawsuit is subject to court approval and must be designed in the best interests of the class as a whole.

6. I respectfully request that the Court approve a Class Representative Service Payment of $10,000, subject to Court approval, for the following reasons.

7. First, I devoted a substantial amount of time to assisting Class Counsel and performed significant services on behalf of the Class, all of which contributed to achieving the proposed Settlement.

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8. On September 23, 2024, I initiated this class action in the Superior Court of California, San Francisco County. This action represents my interests and those of all other current and former nonexempt hourly employees similarly situated. On November 20, 2024, the complaint was amended to include a cause of action under the Private Attorneys General Act ("PAGA") on behalf of myself, the State of California, and other similarly aggrieved employees.

9. I estimate that I devoted approximately 35 to 40 hours in total assisting Class Counsel through the date of this declaration, including the activities described below. This included multiple telephone conferences, meetings, emails, text messages, reviewing documents, discussing Defendant's payroll and break practices, locating relevant records, assisting counsel in evaluating the claims, preparing for and participating in mediation, reviewing settlement proposals, and communicating with counsel throughout the litigation.

10. As part of that time, I assisted Class Counsel in evaluating Defendant's policies and practices, identifying relevant witnesses, reviewing documents and records, assessing the strengths and weaknesses of the claims and defenses, reviewing Defendant's settlement proposals, and evaluating the fairness of the proposed Settlement before authorizing its acceptance. I also assisted during the mediation.

11. My work also continued after the mediation, as I reviewed the settlement agreement and other related documents and maintained communication with my lawyers concerning the settlement approval process. This litigation has been pending for approximately 2 years, during which time I remained actively involved and available to assist counsel whenever needed.

12. Second, I respectfully request that the Court approve the requested Class Representative Service Payment because I agreed to put the Class's interests ahead of my own. In doing so, and by bringing this case as a class action, I helped obtain a $325,000 nonreversionary settlement that provides monetary relief to approximately 1,410 current and former nonexempt hourly employees.

13. Third, by serving as the named Plaintiff and Class Representative, I assumed responsibilities and burdens that absent class members did not. My name became publicly associated

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with this lawsuit, and I understood that my participation would be a matter of public record. I undertook these responsibilities despite concerns that being publicly identified as the plaintiff in a lawsuit against my former employer could affect future employment opportunities. I assumed these responsibilities without any guarantee of recovery or success.

14. Fourth, I devoted my time without any assurance that I would receive compensation for those efforts. I understood that, if the Action was unsuccessful, I could receive nothing despite the time and effort I invested on behalf of the Class. Nevertheless, I continued to fulfill my responsibilities because I believed it was important to pursue relief for the affected employees.

15. At all times during this litigation, I understood that my responsibility as Class Representative was to act in the best interests of the Class as a whole. I remained informed regarding the status of the case, communicated regularly with counsel, participated in evaluating the proposed Settlement before authorizing its acceptance, and believe the Settlement is fair, reasonable, and in the best interests of the Class.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 10/22/2026, at Redding, California.

Signed by:
E3779380DC12497...
Marcus Taylor