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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

BRIAN LOZA, as an individual and on behalf
of all others similarly situated,

Plaintiff,

vs.

HIDDEN VALLEY INVESTMENTS, INC.,
dba QUALITY CHEVROLET and QUALITY
CHEVROLET COMMERCIAL TRUCK, a
California Corporation; and DOES 1 through
100,

Defendants.

Case No.: 24CU009062C

*[Case Assigned for all purposes to the Hon.
Joel R. Wohlfeil; Dept. C-73]*

**DECLARATION OF BRIAN LOZA IN
SUPPORT OF APPROVAL OF CLASS
ACTION SETTLEMENT**

Action Filed: September 3, 2024
Trial Date: None Set

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I, Brian Loza, declare as follows:

1. I am an individual over the age of 18 and am the named Plaintiff in this matter.

This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Hidden Valley Investments, Inc., dba Quality Chevrolet (“Quality Chevrolet”) as a Lube Technician from approximately January 2, 2024 until approximately December 2024. My duties included tire rotations, inspections, oil changes, and other routine vehicle repairs.

3. During my employment, Quality Chevrolet paid me incentive and production bonuses. It is my understanding that I was not paid all of my overtime and sick pay wages as a result of these payments. In addition, my meal periods were usually late, short, or interrupted because I had to service a certain number of vehicles each day and could not keep customers waiting. My rest breaks were also short, interrupted, or missed completely for the same reasons. I did not receive proper compensation for these late, interrupted, or missed meal periods and rest breaks. Quality Chevrolet also required me to use my personal cell phone and tools, including ratchets, sockets, pliers, hammers, and tire pressure sensors, to complete my work tasks without reimbursing me for the costs.

4. I brought this lawsuit against Quality Chevrolet because I wanted the company to follow the law and pay its employees what we are owed. I believe I took on a greater burden than other employees because I have been actively involved in the litigation and because my name is attached to the case. I was willing to put my name on the lawsuit, even though I knew it would be a public record, because I felt someone needed to stand up to the company and I was prepared to take on that burden for the benefit of my co-workers.

5. I have been an active participant in this case since I first spoke with my attorneys over a year ago. I provided documents and information needed to start the case, and I spoke with my attorneys many times to discuss the claims and issues. I also shared relevant information about

1 me and my coworkers work experiences to respond to Quality Chevrolet's arguments. Overall, I
2 estimate I spent about 25 hours on activities that helped lead to the resolution of this matter.

3 I declare under penalty of perjury under the laws of the state of California and the United
4 States that the foregoing is true and correct. Executed on September ^{Sep 5, 2025}, 2025, in Oceanside,
5 California.


Brian Loza (Sep 5, 2025 12:41:30 PDT)

Brian Loza