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Attorneys for Plaintiff,
Robert Houston Jr., on behalf of himself, and all others similarly situated, and on behalf of the general public.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF KERN

ROBERT HOUSTON JR., on behalf of himself, and all others similarly situated, and on behalf of the general public,

Plaintiff,

vs.

POWER MACHINERY CENTER, a California Corporation, and DOES 1 through 10, inclusive.

Defendants.

CASE NO.: BCV-24-104326

DECLARATION OF ROBERT HOUSTON JR. IN SUPPORT OF HIS MOTION FOR APPROVAL OF PAGA SETTLEMENT

Date: October 12, 2026
Time: 8:30 a.m.
Dept.: Division J
Judge: Hon. Gregory Pulsksmp

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I, Robert Houston Jr., declare as follows:

1. I am the named representative in this case. I submit this declaration in support of Plaintiff's Motion for Approval of PAGA Settlement. I make this statement of my own personal knowledge, and if called to testify, I could and would testify competently to the facts below.

2. I was employed by POWER MACHINERY CENTER ("PMC" or "Defendant" interchangeably), as an hourly paid non-exempt employee.

3. During my time working for PMC, I believe that I was not paid all wages, including all minimum and overtime wages owed to me, I also believe that I was denied uninterrupted meal and rest breaks, and I was not reimbursed for business expenses.

4. During the time that I was employed at PMC, I followed the same timekeeping, scheduling and payroll policies and practices as the other hourly employees I observed and interacted with.

5. At the beginning of this case, my attorneys made me aware of the general obligations of serving a representative Plaintiff in this case. Because of the wage and hour violations that I experienced during my employment with PMC, I agreed to serve as a representative Plaintiff and pursue my case as a representative action on behalf of the State of California and similarly situated employees of PMC.

6. By deciding to serve as a Named Plaintiff in this case, I agreed to pursue not only my own PAGA claims, but the claims of all similarly situated employees of PMC, and, if necessary, to put the interest of all similarly situated employees ahead of my own. I have no interests that are antagonistic to my coworkers with respect to the claims alleged in this case. I pledged to actively participate in the lawsuit and to assume the risks of serving as a Named Plaintiff in a representative action. My attorney also explained the risks associated with litigation, and that the case could take years to resolve, and therefore required a long-term commitment on my part. I also understood that I was potentially responsible for paying PMC's attorney's fees and costs. However, I accepted these risks.

7. During this litigation, I have spent a significant amount of time working with my attorneys and participating in this lawsuit as follows:

a. I regularly conferenced with my attorneys, before and after the filing of the lawsuit, to discuss the status of the case, to offer my input on PMC's practices and policies, to provide names of witnesses, to assist in gathering evidence and documents that supported

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the claims, to review policy documents and payroll records from PMC, and to discuss settlement options; and

b. I also spent significant time helping my attorneys prepare for mediation and answering questions about how PMC's policies and practices impacted me and my coworkers. I made myself available during the entirety of the mediation, which took place on zoom, approved the tentative settlement, and reviewed and approved the final settlement agreement. I regularly spoke with my attorneys to make sure I was fully informed of the facts and settlement negotiations.

8. Overall, I estimate that I have devoted 35-40 hours of my time to this case. This was not an easy thing to do as I have my own job and responsibilities.

9. By agreeing to bring this representative action, I accepted the responsibilities of representing the interests of the State of California as well as all similarly situated employees and willingly chose to assume risks and potential costs associated with the case. I did, and still do, have a fear that future employers may not hire me should they find out that I served as a representative Plaintiff in a PAGA lawsuit. However, this is another risk I am willing to take in order to further the interests of the case.

10. I am aware that PMC denies the allegations in this lawsuit and that there has been no determination that PMC is actually liable for any of these alleged violations. I also understand that there are many risks and uncertainties involved in continuing to pursue this case. I have been advised of the terms of the proposed settlement of this case, and in light of the risks and uncertainties in proceeding with the case, I believe the proposed settlement is fair and reasonable and in the best interests of the aggrieved employees.

11. I have requested an enhancement award for my services as a Named Representative in the amount of $2,500.00. I believe that my request for this service award is fair and reasonable in light of the amount of work I put into this case to ensure a good result as well as the risks (as mentioned above) I took in serving as a Named Representative

I declare under penalty of perjury that the foregoing is true and correct under the laws of the State of California. Executed on 10 / 12 / 2026 in California.

ROBERT HOUSTON JR.

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