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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF MADERA

DANIEL DURAN, on behalf of himself and all
others similarly situated,

Plaintiff,

vs.

TURF OPERATION FRESNO, INC., a
corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No.: MCV095208

CLASS ACTION

*[Assigned for all purposes to the Hon.
Michael J. Jurkovich]*

**DECLARATION OF DANIEL DURAN
IN SUPPORT OF APPROVAL OF
CLASS ACTION SETTLEMENT**

DECLARATION OF DANIEL DURAN

I, DANIEL DURAN, declare as follows:

1. I am an individual over the age of 18 and am a named plaintiff in this matter against Turf Operation Fresno, Inc. ("TOF"). 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 TOF as an hourly Lawn Technician from approximately August to November 2024.

3. While working for TOF, I believe that I was not provided with the 30-minute meal breaks and 10-minute rest breaks to which I was entitled under the law, and that TOF improperly deducted my time for meal breaks. I also believe that I was not paid overtime properly because TOF did not calculate my overtime rate according to California law. As a result of these violations, I understand that I did not receive accurate paystubs and I was not paid all wages owed to me at the end of my employment. In addition, I had to use my personal cell phone for work, including to clock in and clock out, to navigate to customers' houses, and other uses.

4. I have been actively involved in this case since I first had discussions with my attorneys at Marquee Law Group about a potential class action back in November 2024. I have had many discussions with my attorneys throughout this case to discuss TOF's policies and practices, identify potentially helpful documents and witnesses, and to discuss the case. I also spent time looking for relevant documents and reviewing documents related to this case, including the settlement agreement. I estimate that I have spent at least 15-20 hours on this case from the time I first spoke with my attorneys regarding this case until the present.

5. When I discussed this case with my attorneys and agreed to move forward with this case, I understood that this lawsuit could benefit other TOF employees by helping to recover unpaid wages and other penalties. I knew that filing a lawsuit carries risk, but I accepted this risk because I wanted to vindicate my and other employees' rights. Even though I

understood that filing a lawsuit is a public record, I accepted that burden in order to help other TOF employees.

6. As part of the proposed Settlement, I understand that my attorneys will request that the Court approve a service award of \$7,500 for my efforts on behalf of the Settlement Class. I believe this amount is reasonable based on the amount of time and effort I have devoted to this case as well as the risks I have undertaken as the class representative, as described above. In addition, by the time this settlement is finally approved and funded, it will likely be 2 years or more since the time I first agreed to act as a class representative in this case. I believe that the delay in my receiving any payment from this case is another factor supporting my requested service award.

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

Dated: 5/8/2026

DocuSigned by:
Daniel Duran
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Daniel Duran