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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

LEON COYLE, an individual, on behalf of himself and on behalf of all persons similarly situated and allegedly aggrieved, Plaintiff, vs. ESET, LLC, a Limited Liability Company; and DOES 1 through 50, inclusive, Defendants.	CASE NO.: **25CU002846C** [*Related to 25CU004456C*] **DECLARATION OF JOHN H. GOMEZ** Hearing Date: December 11, 2026 Hearing Time: 9:10 a.m. Judge: Hon. Judy S. Bae Dept.: 62 Date Action Filed: January 16, 2025 Trial Date: Not set

I, JOHN H. GOMEZ, declare as follows:

1. I am an attorney licensed to practice before all courts of the State of California. I am the founder and managing partner of Gomez Trial Attorneys, and one of the attorneys of record for the Plaintiffs and the putative class in the above-entitled action. I have personal

knowledge of the facts set forth below, and if called to testify, I could and would do so competently.

2. I submit this Declaration in support of Plaintiffs' Motion for Preliminary Approval of the Class Action and PAGA Settlement (the "Preliminary Approval Motion"), which is filed concurrently herewith.

The Settlement Is Fair, Reasonable, And Adequate, It Should Be Granted Preliminary Approval

3. I am not aware of any conflicts of interest between my firm, its attorneys, my co-counsel's firms and attorneys, and Plaintiffs or any other Class Member.

4. As outlined in the accompanying declarations and supporting documents submitted concurrently, the Class Action and PAGA Settlement Agreement ("Settlement") represents a fair, reasonable, and adequate resolution of the claims in this case. I fully support this Settlement, as it serves the best interests of Plaintiffs.

5. To ensure that the Class received the strongest and most effective representation possible, my firm strategically partnered with Blumenthal Nordrehaug Bhowmik De Blouw LLP, respected colleagues with whom we have successfully collaborated on numerous cases. Their experience in class action and PAGA litigation brought invaluable expertise to this case, further strengthening our ability to advocate for the Class. Their extensive background in wage and hour litigation, combined with their deep understanding of the complexities involved in prosecuting large-scale class and representative actions, played a critical role in advancing this case toward a successful resolution.

6. Given our extensive experience handling wage and hour class actions, my co-counsel and I are well-qualified to assess the strength of the class claims and the viability of Defendants' defenses. In our judgment, this Settlement achieves a fair, reasonable, and adequate outcome for the Class.

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Plaintiffs' Counsel Is Experienced in Employment & Wage and Hour Litigation

7. I earned my Bachelor of Business Administration from the University of San Diego, California, in 1989 and my Juris Doctorate from Yale Law School in 1993.

8. I am the founder and managing partner at Gomez Trial Attorneys, a distinguished and diversified law firm that was established in 2005. My firm has consistently delivered outstanding results for Plaintiffs across a wide range of legal matters, including Employment, Personal Injury, and Class Actions.

9. As seasoned litigators, my team has handled numerous employment matters, representing employees in wage and hour disputes, wrongful termination cases, harassment, retaliation, and discrimination claims, and various other employment-related matters both in state and federal courts.

10. Since being admitted to the bar, I have handled a broad spectrum of cases. I have gained extensive experience litigating employment matters, personal injury cases, and class actions. I am a two-time San Diego "Trial Lawyer of the Year" recipient and have tried class cases to jury verdict.

11. I have had class action litigation experience, mostly in the area of employment class actions. I have experience in cases involving labor code violations and wage and hour claims. I have litigated similar wage and hour cases against other employers on behalf of employees. My firm has been approved as class counsel in California courts previously. It is this level of experience that enabled my firm to undertake the instant matter.

12. Based on the history of this case and given our firm's extensive experience as class and representative action employment and wage and hour litigators, it is my view that the settlement is fair, reasonable, and adequate, and in the best interest of the Class.

13. I have no conflicts of interest with the Class Representatives.

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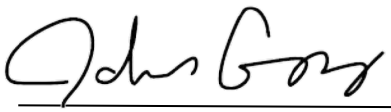
14. I have not previously represented Defendants in any matter.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 10th day of November 2026, at San Diego, California.



John H. Gomez, Esq.