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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF ORANGE**

11 JOSE JIMENEZ, as an individual and on behalf
12 of all others similarly situated,

13
14 Plaintiff,

15 vs.

16 FENCEWORKS, INC., a California Corporation;
17 and DOES 1 through 100,

18 Defendants.

Case No. 30-2018-01034150-CU-OE-CXC

CLASS ACTION

*[Assigned for all purposes to the Hon.
William D. Claster; Dept. CX104]*

**DECLARATION OF JAVIER
VALENZUELA OF FENCEWORKS,
INC. IN SUPPORT OF PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: October 16, 2020

Time: 9:00 a.m.

Dept.: CX104

Complaint Filed: November 26, 2018

Trial Date: None.

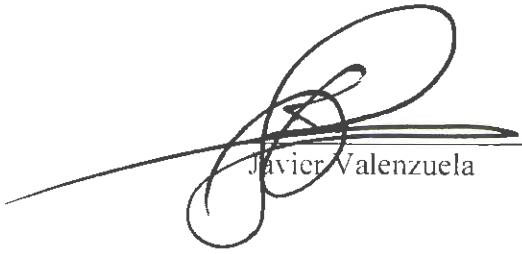
1 I, JAVIER VALENZUELA, declare as follows:

2 1. I am the Executive Vice President of Fenceworks, Inc. and I have personal
3 knowledge of the facts stated in this declaration and could testify competently to them if called
4 upon to do so. I am over the age of eighteen years.

5 2. Other than this instant class action, *Jose Jimenez v. Fenceworks, Inc.*, there are no
6 lawsuits currently pending against Fenceworks, Inc. that allege any of the same claims or causes
7 of action that are alleged in this instant action. In addition, other than Mr. Jimenez, no other
8 current or former employee of Fenceworks, Inc. has submitted a letter to the Labor and Workforce
9 Development Agency ("LWDA") regarding any alleged violations of the California Labor Code.
10 I am also not aware of any individual actions currently pending against Fenceworks, Inc., that
11 allege any of the same claims or causes of action that are alleged in this instant action

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

14 Dated: October 6, 2020

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16 Javier Valenzuela
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