

**VERIFICATION**

I, Luis Garcia, declare:

1. I am the Controller at Chula Vista Auto, where plaintiff Christopher Hao-Keppel was employed by defendant, Desert Auto Group V, LLC., a party in this matter, and I am authorized to make this verification for and on behalf of said party.

2. The responses to Request for Production of Documents, Set Two, are not all within the personal knowledge of declarant, and declarant is informed that there is no single individual at Desert Auto Group V, LLC., who has personal knowledge of all such matters.

3. The aforementioned supplemental responses are based upon information assembled by authorized employees and counsel of defendant, Desert Auto Group V, LLC., and declarant is informed and believes that the responses based upon such information are true and correct.

4. As to those matters within my own personal knowledge, the responses are true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge and belief.

Executed on December 22, 2023, at Chula Vista, California.

DocuSigned by:

*Luis Garcia*

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Luis Garcia

VERIFICATION