EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION

CHAD LYONS; and CHRISTIAN TAVERAS, individually and on behalf of others similarly situated, Plaintiffs, vs. IR LABS DE, LLC; and SOURCETEK, INC. Defendants.	)	Case No. 4:24-cv-00002-SHL-SBJ **DECLARATION OF WILLIAM "JACK" SIMPSON**

I, William "Jack" Simpson, hereby declare as follows:

1. I am the attorney representing the Plaintiffs, Chad Lyons and Christian Taveras.
2. I am the managing member of Simpson, PLLC, and I dedicate my practice to representing employees in wage and hour and WARN Act litigation.
3. I am currently representing classes and putative classes of employees in wage and hour and WARN litigation in ten different jurisdictions.
4. I have recovered over $4,000,000 for employees in settlements that are either already disbursed or pending approval.
5. Timm Reid is a member of the Reid Law Firm.
6. Mr. Reid has practiced law for 35 years representing injured people and mediating in, primarily, personal injury, medical malpractice, product liability and employment related claims.
7. Mr. Reid has been a Martindale-Hubbell AV-rated lawyer for 20+ years.

8. Before Defendants IR Labs DE, LLC ("IR Labs") and SourceTek, Inc., ("SourceTek") answered the Complaint, the Defendants produced voluminous payroll information that allowed us to assess the validity of the claims and perform a damage analysis.
9. For example, IR Labs bi-monthly produced payroll data for the employees defined as the "IR Labs FLSA Settlement Group" in the Settlement Agreement.
10. This payroll data provided the number of overtime hours each employee worked, the amount of commission or milestone bonus payment received, and the number of weeks each employee worked.
11. With this payroll data, we were able to perform calculations of how much overtime the IR Labs FLSA Settlement Group would be owed under various circumstances.
12. After thoroughly analyzing and reviewing this data, we attended mediation with the honorable John Jarvey.
13. At mediation, we settled the claims brought by the IR Labs FLSA Settlement Group. The settlement provides a meaningful recovery to the members of the IR Labs FLSA Settlement Group and allows the parties to avoid the costs of protracted litigation. The settlement also avoids the risks that these claims would be unsuccessful at trial or through dispositive motion practice.
14. The remaining claims brought in this litigation were not settled at mediation.
15. Following mediation, the Parties continued to exchange information informally as well as begin written discovery.
16. The settlement conversations that began at mediation continued throughout the following months.

17. The Defendants produced payroll information for the SourceTek Settlement Group that allowed us to evaluate the validity of the claims brought in this litigation as well as the potential damages that could be recovered.
18. I interviewed the members of the SourceTek Settlement Group to assess the potential amount of overtime hours that might exist.
19. After extensive negotiations, a settlement was reached that resolved the claims brought by the SourceTek Settlement Group. All twenty-nine members of the SourceTek Settlement Group have individually retained my firm to represent them, and all have agreed to the settlement and the allocations of the Settlement Fund among the SourceTek Settlement Group.
20. I believe the terms of the Settlement Agreement to be fair and reasonable. The Settlement Agreement provides for a meaningful recovery.
21. After the parties reached a settlement to resolve the underlying claims of the IR Labs FLSA Settlement Group and SourceTek Settlement Group, the parties exchanged information and initiated negotiations to resolve the remaining claims for attorneys' fees and costs. The settlement of the claims for attorneys' fees and costs was negotiated separately from the settlement of the FLSA claims.
22. To the best of my knowledge, there are no conflicts of interest between myself and any members of the IR Labs FLSA Settlement Group and SourceTek Settlement Group.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Executed this February 10, 2025.

/s/ William "Jack" Simpson
William "Jack" Simpson