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Attorneys for Plaintiff JACOB GRIFFIN

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

JACOB GRIFFIN, on behalf of the State of
California, as a private attorney general,

Plaintiff,

vs.

COURTESY CHEVROLET CENTER, a
California Corporation; and DOES 1 through
10, inclusive,

Defendants.

Case No: 37-2022-00005485-CU-OE-CTL

Action Filed: February 14, 2022

**DECLARATION OF JACOB GRIFFIN IN
SUPPORT OF PLAINTIFF'S MOTION TO
APPROVE PAGA SETTLEMENT**

Date: July 7, 2023

Time: 10:30 a.m.

Dept.: C-64

Judge: Hon. Loren G. Freestone

1 I, JACOB GRIFFIN, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am the lead named Plaintiff in the
4 above PAGA action filed against COURTESY CHEVROLET CENTER (hereinafter, "Defendant").

5 2. I am submitting this declaration in support of Plaintiff's Motion to Approve PAGA
6 Settlement.

7 3. I seek to represent the State of California and a group of Aggrieved Employees consisting
8 of individuals employed by Defendant as non-exempt employees in California. I worked for Defendant
9 as a non-exempt employee from September of 2020 to August of 2021. Defendant operates car
10 dealerships, including San Diego County where I worked. As a non-exempt employee compensated
11 on an hourly basis, I was entitled to legally mandated meal and rest periods, minimum wage and
12 overtime compensation. During my employment, Defendant failed to provide compliant meal and rest
13 periods, furnished inaccurate itemized wage statements, failed to reimburse for required business
14 expenses, miscalculated the regular rate of pay for purposes of paying overtime, double time and sick
15 pay compensation, among other things. Throughout my employment, I was subject to Defendant's
16 written policies and procedures.

17 4. I and the Aggrieved Employees, that I am seeking to represent, were subject to the same
18 alleged unlawful employment policies and practices at issue in this action, including but not limited
19 to, Defendant's failure to provide compliant meal and rest periods, furnish accurate itemized wage
20 statements, failure to reimburse for required business expenses, and miscalculation of the regular rate
21 of pay for purposes of paying overtime compensation, double time compensation, and sick pay.
22 Factually, Defendant's policies and practices apply to myself and all Aggrieved Employees, and
23 Defendant's liability can be determined by facts common to all.

24 5. Further, there is no conflict between my interests and the interests of the Aggrieved
25 Employees that I am seeking to represent. My interests are entirely coextensive with the interests of
26 the Aggrieved Employees. I allege that I was injured by the same company-wide policies and practices
27 to which the Aggrieved Employees were subjected and seek the same relief. I have already
28 demonstrated my ability to advocate for the interests of the state and the Aggrieved Employees by

1 initiating this litigation, communicating with PAGA Counsel about the claims as they apply to myself
2 and others, undertaking extensive document evaluation and evaluating the proposed settlement to
3 assure that it is fair.

4 6. I understood at the time that I filed this action, that as a representative, I owed a duty to
5 the state and the Aggrieved Employees to faithfully prosecute this action with their best interests at the
6 forefront of every decision. I understood that I could not make any decision in this action for the sole
7 benefit of my personal interest. I understood that in executing this duty, I might have been asked to
8 sacrifice my personal best interests for the benefit of the interests of the Aggrieved Employees.
9 Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible
10 relief for my former co-workers for what I perceived to be Defendant's unlawful wage and hour
11 practices. I believe that I faithfully executed the duties of a representative throughout this litigation
12 and will continue to do until this litigation is fully and finally resolve.

13 7. I believe that the proposed settlement before the court is fair, reasonable and adequate,
14 and made in the best interest of the state and the Aggrieved Employees. I further support the fees being
15 requested by PAGA Counsel in this matter. Consequently, I respectfully, and humbly, ask the Court
16 to grant approval of the Settlement and all of its terms.

17 I declare under the penalty of perjury under the laws of the State of California that the foregoing
18 is true and correct. Executed 06/07, 2023, at San Deigo (location/City), California.

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20 By: 
21 Jacob Griffin (Jun 7, 2023 12:30 CDT)
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