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SUPERIOR COURT OF THE STATE OF CALIFORNIA**IN AND FOR THE COUNTY OF SAN BERNARDINO**

CHRISTOPHER CHACON, an individual, on
behalf of himself and on behalf of all persons
similarly situated and the State of California,

Plaintiff,

v.

PANDA MOTORS, INC. a California
Corporation; EDGAR CASTELLANOS, an
individual; and DOES 2-50, Inclusive,

Defendants.

Case No. CIVDS2022220

**DECLARATION OF LUIS VEGA IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: April 20, 2023

Time: 1:30 p.m.

Judge: Hon. Joseph Ortiz

Dept.: S17

1 I, LUIS VEGA, 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 one of the named Plaintiff in the
4 above wage and hour class action filed against PANDA MOTORS INC. and EDGAR CASTELLANOS
5 (hereinafter collectively "Defendants").

6 2. This declaration is being submitted in support of Plaintiffs' motion for Preliminary
7 Approval of Class Action Settlement.

8 3. I believe that I am, have been and will continue to represent the interests of the class
9 fairly and adequately. I have claims that are typical of the claims the Class Members that I am seeking
10 to represent.

11 4. I worked for Defendants as an hourly, non-exempt employee from 2015 to June 30,
12 2021. At all times during my employment, I earned an hourly wages, various bonuses and
13 commissions, and was entitled to legally compliant meal and/or rest periods, and minimum, regular
14 and overtime wages for all hours worked. Throughout my employment, I was subject to Defendants'
15 written policies and procedures.

16 5. Generally, my lawsuit claims that Defendants failed to pay for all time worked,
17 including, failed to pay overtime at the correct rate of pay, failed to provide compliant meal and rest
18 periods, failed to furnish accurate itemized wage statements, and failed to pay all wages upon
19 separation failure.

20 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
21 to represent because I was subject to the same alleged unlawful employment policies and practices at
22 issue in this action, including but not limited to, Defendants' failure to provide complaint meal and
23 rest periods, failure to pay at the correct rate, failure to furnish accurate itemized wage statements, and
24 failure to pay all wages when due. Factually, Defendants' policies and practices apply class wide, and
25 Defendants' liability can be determined by facts common to all members of the Class.

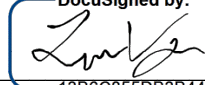
26 7. Further, there is no conflict between my interests and the interests of the class that I am
27 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that

1 I was injured by the same company-wide policies and practices to which the proposed Class was
2 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
3 of the Class by initiating this litigation, undertaking extensive class discovery, and evaluating the
4 proposed settlement to assure that it is fair.

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

14 9. I believe that the proposed settlement before the Court is fair, reasonable, and adequate,
15 and made in the best interest of the Settlement Class Members. Consequently, I respectfully, and
16 humbly, I ask the Court to grant preliminary 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 3/20/2023, at 3/20/2023, California

19 DocuSigned by:
20 By: 
21 LUIS VEGA 13B6C855DB3B44E...