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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF SAN JOAQUIN**

ANTHONY MASINAS, individually,  
and on behalf of other members of the  
general public similarly situated; JUAN  
PARTIDA, individually, and on behalf of  
other members of the general public  
similarly situated and on behalf of other  
aggrieved employees pursuant to the  
California Private Attorneys General Act;

Plaintiffs,

vs.

FLEETPRIDE, INC., an Alabama  
corporation; and DOES 1 through 100,  
inclusive,

Defendants.

Case No.: STK-CV-UOE-2018-0015792

Honorable Jayne Lee  
Department 10C

**CLASS ACTION**

**DECLARATION OF ANTHONY MASINAS  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT, ATTORNEYS'  
FEES AND COSTS, AND ENHANCEMENT  
PAYMENTS**

[Notice of Motion and Motion for Final Approval  
of Class Action Settlement; Declarations of  
Proposed Class Counsel (Edwin Aiwazian, Kevin  
Barnes, and Raphael A. Katri); Declaration of  
Class Representative (Juan Partida); Declaration  
of Settlement Administrator (Kevin Lee); and  
[Proposed] Final Approval Order and Judgment  
filed concurrently herewith]

Date: January 5, 2022  
Time: 9:00 a.m.  
Department: 10C

Complaint Filed: December 18, 2018  
FAC Filed: August 3, 2021  
Jury Trial Date: None Set

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I, **Anthony Masinas**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Fleetpride, Inc. ("Fleetpride") as an hourly-paid, non-exempt employee from approximately August 2017 to approximately October 2017. I decided to seek legal advice about my work experiences with Fleetpride and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there, including Arby Aiwazian. I wanted to do whatever I could to make sure Fleetpride paid me and other employees what was owed to us and stopped its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 7 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 6 hours discussing my situation, complex wage-and-hour class actions in general, and what it meant to initiate a lawsuit and be a named plaintiff and class representative.

3. I have spent over 17 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with Fleetpride, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance regarding the duties of hourly-paid, non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Fleetpride. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

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1           4.       Throughout the case, I was available to answer any questions my attorneys had,  
2 and available to speak and meet with my attorneys whenever they needed me. I responded to  
3 them as quickly as possible and gave them as much information and identified as many  
4 documents as I could. I spent at least 12 additional hours speaking with my attorneys about the  
5 case, identifying potential witnesses, providing my attorneys with documents and information  
6 concerning the case, and also describing policies, practices, and procedures of Fleetpride. During  
7 the discovery phase of the litigation, I spent approximately 6 additional hours reviewing  
8 Driftwood's discovery requests, locating documents, and providing documents and responses to  
9 my attorneys.

10           5.       On October 1, 2019, I attended a full day of deposition that lasted approximately  
11 5.5 hours. I spent at least 4 hours preparing for the deposition and approximately 2 additional  
12 hours traveling to and from the deposition. After the deposition, I spent at least 2 hours  
13 reviewing my testimony and discussing the contents of the deposition transcript with my  
14 attorneys.

15           6.       As far as the settlement is concerned, I was available to review documents and  
16 answer any questions my attorneys had. I spent about 3 hours reviewing the settlement  
17 agreement and about 2 hours asking questions and discussing the potential settlement with my  
18 attorneys before signing the settlement agreement.

19           7.       I believe that I have done everything that my attorneys have asked of me and have  
20 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result  
21 obtained in this case, and as a class representative, I respectfully request that the Court award me  
22 an enhancement payment in the amount of \$10,000.00 for my active participation in this case.  
23 Taking into consideration the time that I have dedicated to this case, I believe that this amount is  
24 reasonable.

25           8.       I am not related to anyone associated with Lawyers *for* Justice, PC, the Law  
26 Offices of Kevin T. Barnes, or the Law Offices of Raphael A. Katri.

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9. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement payment, as well as my share of the settlement fund as a class member.

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

05/19/2021  
Executed this \_\_\_\_ day of May 2021, at Stockton, California.

Electronically Signed \_\_\_\_\_ 2021-05-19 16:30:11 UTC - 172.58.19.230

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Anthony Masinas