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Attorneys for Plaintiff Anthony Masinas

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,

Plaintiff,

vs.

FLEETPRIDE, INC., an unknown business
entity; 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 PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Plaintiffs' Motion for Preliminary Approval of
Class Action Settlement; Declarations of Class
Counsel (Edwin Aiwazian, Kevin T. Barnes,
and Raphael A. Katri); Declaration of Proposed
Class Representative (Juan Partida); and
[Proposed] Order filed concurrently herewith]

Date: August 3, 2021
Time: 9:00 a.m.
Department: 10C

Complaint Filed: December 18, 2018
Trial Date: None Set

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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



AssureSign® _____ 1b88c4f-29bc-4c62-b78a-ad200007429c

Anthony Masinas