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Attorneys for Plaintiff JOSE DE LA TORRE,
individually and on behalf of all others similarly situated

(ADDITIONAL COUNSEL ON NEXT PAGE)

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

JOSE DE LA TORRE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

USA WASTE OF CALIFORNIA, INC., a
Texas Corporation, and DOES 1-50,
inclusive,

Defendants.

Case No. 20STCV16032

ASSIGNED FOR ALL PURPOSES TO
JUDGE: ELIHU M. BERLE, DEPT. 6

**DECLARATION OF PLAINTIFF LORI
ARELLANO IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

ADDITIONAL COUNSEL

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Attorneys for Plaintiffs

1 I, Lori Arellano, declare as follows:

2 1. I am an individual over the age of 18 year and one of the named Plaintiffs in the
3 above-captioned matter. I have personal knowledge of the facts contained in this declaration,
4 and if called as a witness, could and would testify as to their accuracy.

5 2. I was formerly employed by Defendants WASTE MANAGEMENT OF
6 CALIFORNIA, INC. and WASTE MANAGEMENT, INC. (jointly "Defendants") as a non-
7 exempt hourly truck driver. I was hired by Defendants on or about August 15, 2022 and was
8 terminated from employment on September 29, 2022.

9 3. This declaration is submitted in support of Plaintiffs' Motion for Preliminary
10 Approval of Class Action Settlement.

11 4. During my employment with Defendant, I believe that I was not provided with
12 accurate itemized wage statements. Specifically, whenever I was paid overtime wages, I don't
13 believe that the total hours worked was correctly listed. I also believe that I was not paid all
14 wages during my employment and that I was not provided with meal and rest periods as
15 required by California law. .

16 5. I do not believe I have any interests that are adverse to the other employees that
17 are part of this settlement.

18 6. I understand that the filing of this action was a matter of public record and that
19 this was being prosecuted on a class and representative basis. I understand that a class and
20 representative action would take longer in litigation than an individual action and I accepted
21 such risks.

22 7. During the course of this litigation, I have always made myself available to
23 answer questions, gather and provide documents, respond to written discovery, review and
24 execute the settlement agreement and this declaration. I will continue to make myself available
25 to review any other documents needed to bring this matter to conclusion. I estimate that I have
26 spent 40 hours in the prosecution of this action.

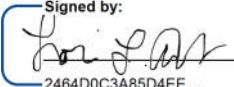
27 8. As part of the Settlement Agreement, I understand that I will be providing a
28 general release of my own individual claims, something that the Settlement Class Members did

1 not have to do.

2 9. I am proud of the result and accomplishment of this lawsuit. I feel that it is a
3 positive accomplishment and understand that other people will benefit because of the actions
4 that I have taken.

5
6 I declare under penalty of perjury under the laws of the State of California that the
7 foregoing is true and correct.

8
9 Executed on February 7, 2025, at Montgomery Creek, California.

10
11  Signed by:
2464D0C3A85D4EE...
Lori Arellano