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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.

WASTE MANAGEMENT OF  
CALIFORNIA, INC., a California  
Corporation, WASTE MANAGEMENT,  
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.

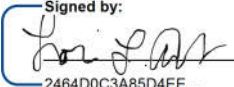
27 8. As part of the Settlement Agreement, I understand that I will be providing a  
28 general release of my own individual claims, something that the Settlement Class Members did

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