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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 FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

ADDITIONAL COUNSEL

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Attorneys for Plaintiffs

I, Lori Arellano, declare as follows:

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

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

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

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

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

6. I have not previously been a named plaintiff in any other class action or PAGA cases, other than this case.

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

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

9. As part of the Settlement Agreement, I understand that I will be providing a general release of my own individual claims, something that the Settlement Class Members did not have to do.

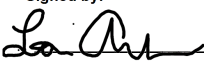
10. I am aware in cases like mine, that there is the risk that if I do not win my case, Defendant could have sought its costs against me. I accepted that risk in this case, which I understood could be substantial.

11. I also understood that filing this lawsuit is a public record and I accepted that burden. As such, I risked my future employment in order to bring this action. Moreover, this lawsuit, which is a public record, is something that potential employers can look into, and which may cause a negative impact of my employment prospects.

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

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

Executed on June 13, 2025, at Montgomery Creek, California.

Signed by:

 2464D0C3A85D4EE...
 Lori Arellano