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Attorneys for Plaintiff and the Class

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

RICHARD TOBIN, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

vs.

RYDER TRUCK RENTAL, INC., a
Florida corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 5:20-cv-01569-JGB-SHK

**DECLARATION OF PLAINTIFF
RICHARD TOBIN IN SUPPORT
OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date:

Time: 9:00 A.M.

Location: Courtroom 1
3470 Twelfth Street
Riverside, CA 92501

1 I, Richard Tobin, hereby declare and state as follows:

2 1. I am the named plaintiff in this matter. I am an individual over the age
3 of 18 years old. I have personal knowledge of the facts set forth below, and if
4 called to testify I could and would do so competently.

5 2. I have been employed by Defendant Ryder Truck Rental, Inc.
6 (“Defendant”) since about May 2013 as an hourly, non-exempt employee.

7 3. During my employment with Defendant, I believe that I did not
8 receive accurate wage statements. Specifically, whenever I was paid “Premium” or
9 “ONCALPAY” wages, the wage statements I received showed only a gross
10 amount paid, rather than the hourly rate of pay and number of hours worked for
11 each rate.

12 4. During the pendency of this lawsuit, I was required to provide
13 assistance to my attorneys. This included meeting and conferring with my
14 attorneys, providing my attorneys with documents and information, and reviewing
15 the pleadings and documents in this case.

16 5. Throughout this case, I have continuously been kept apprised of the
17 status of this case.

18 6. I understand that the class claims alleged in this action were brought
19 on behalf of other similarly situated employees, and thus I am acting as a
20 representative for the Class. As the class representative, I understand that it is my
21 responsibility to act in the Class’s best interest and not my own. I agree that I will
22 not put my own interests ahead of that of the Class. Moreover, I am not aware of
23 any conflicts that exist between my interest and the interests of the Class that
24 would impair or affect my ability to serve as representative for the Class.

25 7. I have and continue to be willing to assist in the investigation of this
26 matter, as well as make myself available for trial or any further proceeding in this
27 matter as required to represent the interests of the Class. I also understand my
28 duties and responsibilities to the Class and will carry out those duties as necessary.

Executed on this 7 day of March, 2021, at Los Angeles, California.

DocuSigned by:
12/2
Richard Tobin
13 E 99919 G07464...

**DECLARATION OF PLAINTIFF RICHARD TOBIN IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**