

David Mara, Esq. (230498)
Jill Vecchi, Esq. (299333)
MARA LAW FIRM PC
2650 Camino Del Rio North, Suite 302
San Diego, California 92108
Telephone: (619) 234-2833
Facsimile: (619) 234-4048

Attorneys for Plaintiffs SONNY WILLIAMS
and STEVEN RUNKLE on behalf of themselves
and all other similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN BERNARDINO

SONNY WILLIAMS and STEVEN
RUNKLE on behalf of themselves, all others
similarly situated, and on behalf of the
general public,

Plaintiffs,

v.

HANSEN & ADKINS AUTO
TRANSPORT, INC.; HANSEN & ADKINS,
INC.; and DOES 1-100, inclusive,

Defendants.

Case No. CIVDS2020832

*[Assigned For All Purposes to the
Honorable Joseph T. Ortiz; Dept. S17]*

**DECLARATION OF SONNY WILLIAMS
IN SUPPORT OF SETTLEMENT
APPROVAL**

Complaint Filed: September 25, 2020
Trial Date: None Set

1 I, SONNY WILLIAMS, declare as follows:

- 2 1. I have personal knowledge of all matters stated herein, and if called as a witness, I could
3 and would competently testify thereto, except as to those matters stated upon information
4 and belief, and as to those matters, I believe them to be true.
- 5 2. I am a named Plaintiff and Class Representative in the above-captioned lawsuit, and I
6 submit this declaration in support of settlement approval.
- 7 3. I worked for Hansen & Adkins Auto Transport, Inc. ("Hansen & Adkins") as a driver that
8 Hansen & Adkins classified as an independent contractor in California from
9 approximately October 2009 to April 2019.
- 10 4. I bought this action to redress certain claims that I had against Hansen & Akins. Namely,
11 I felt that I should have been classified as an employee not an independent contractor. On
12 September 25, 2020, I brought this class action lawsuit.
- 13 5. I had many meetings and conversations with my attorneys about my experience working
14 for Hansen & Adkins.
- 15 6. Since becoming a class representative, I have diligently worked on this case.
- 16 7. Throughout the case, I regularly talked with my attorneys. I always answered phone calls
17 from my attorneys or called them back promptly when they called. I also promptly
18 responded to emails sent by my attorneys.
- 19 8. This case has been pending for almost three and a half years. During the entirety of this
20 time, I have worked diligently to help progress it forward. I have spent many hours in
21 prosecuting this case.
- 22 9. I also looked for documents from my time working for Hansen & Adkins and provided
23 my attorneys with all documents I found, such as settlement sheets. I provided my
24 attorneys with over 4,200 documents from my time working for Hansen & Adkins.
- 25 10. Hansen & Adkins propounded six sets of written discovery on me. I worked with my
26 attorneys in responding to this discovery and carefully reviewed the responses and verified
27 they were accurate. I also worked with my attorneys in providing supplemental responses
28

1 to this discovery. I carefully reviewed the supplemental responses and verified they were
2 accurate.

3 11. On August 18, 2022, Hansen & Adkins took my deposition. I met with my attorneys prior
4 to my deposition to prepare for it.

5 12. I provided my attorneys with a declaration in support of class certification. I also flew
6 down from Sacramento, California to attend the class certification hearing in person.

7 13. Although I did not attend the mediation in person, I was available on the phone. I also was
8 kept apprised of settlement negotiations that occurred after mediation. I gave my consent
9 to settle with Hansen & Adkins for the gross settlement amount of \$3,950,000. I
10 completely and carefully reviewed the Memorandum of Understanding ("MOU") and
11 settlement agreement. I then signed the MOU and settlement agreement.

12 14. In light of the work I performed in this case and the duties associated with being a class
13 representative in a case of this magnitude, I believe the \$20,000 class representative
14 enhancement payment is reasonable. I understand that this additional payment is not
15 guaranteed and is subject to Court approval.

16 15. I have and will continue to adequately represent all of the interests of the class. With my
17 status as class representative, I will treat the interests of the Class above my interests.

18 16. I recognize that any resolution of this matter must be approved by the Court in terms of
19 whether the settlement is fair and reasonable, and that I am obligated to protect the interests
20 of all of Class Members for the Class Period.

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

23
24 Date: 3/27/2024

25
26 DocuSigned by:
Sonny Williams
B08D643EF5D7400...
SONNY WILLIAMS