

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 STEVEN RUNKLE
IN SUPPORT OF SETTLEMENT
APPROVAL**

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

1 I, STEVEN RUNKLE, 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 February 2017 to December 2018.
- 10 4. I contacted my attorneys because I felt that I should have been classified as an employee
11 not an independent contractor.
- 12 5. I had many meetings and conversations with my attorneys about my experience working
13 for Hansen & Adkins.
- 14 6. Throughout the case, I regularly talked with my attorneys. I always answered phone calls
15 from my attorneys or called them back promptly when they called. I also promptly
16 responded to emails sent by my attorneys. I allowed my attorneys to obtain my personnel
17 file from Hansen & Adkins.
- 18 7. I provided my attorneys with contact information for other drivers for them to contact.
- 19 8. I provided my attorneys with a declaration in support of class certification. I also attended
20 the class certification hearing in person.
- 21 9. I gave my consent to settle with Hansen & Adkins for the gross settlement amount of
22 \$3,950,000. I completely and carefully reviewed the settlement agreement. I then signed
23 the settlement agreement.
- 24 10. In light of the work I performed in this case and the duties associated with being a class
25 representative in a case of this magnitude, I believe the \$15,000 class representative
26 enhancement payment is reasonable. I understand that this additional payment is not
27 guaranteed and is subject to Court approval.

1 11. I have and will continue to adequately represent all of the interests of the Class. With my
2 status as class representative, I will treat the interests of the Class above my interests.

3 12. My claims are typical of the Class Members because I am similarly situated to all
4 individuals who signed Independent Contractor Service Agreements ("ICSAs") with
5 Hansen & Adkins and worked as truck drivers for Hansen & Adkins in California in service
6 of those ICSA's at any time from July 6, 2016 to June 13, 2023. Thus, my interests are the
7 same as all members of the proposed Class.

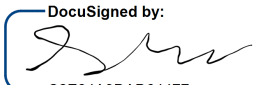
8 13. In summary, over the course of this litigation I have spent a significant amount of time
9 conferring and working with my attorneys on the prosecution of my claims and evaluating
10 the settlement and related documents. I have spent numerous hours of my time assisting
11 and providing information to my attorneys in the prosecution of this lawsuit.

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

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

17
18 Date: 3/19/2024

19
20
21
22
23
24
25
26
27
28

DocuSigned by:

C2E84A9DAD64477
STEVEN RUNKLE