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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF MERCED**

JASON ADAMS, RAUL ALVARADO, EMMA  
SARWAR, SERGIO RODRIGUEZ, and  
SHENITA TATUM, as private attorneys general  
and as an individual and on behalf of all others  
similarly situated,

Plaintiffs,

vs.

SCHOLLE IPN PACKAGING, INC., a Nevada  
corporation; SCHOLLE PACKAGING, INC., a  
Nevada corporation; and DOES 1 through 50,  
inclusive,

Defendants.

Case No. 20CV-02350

**DECLARATION OF JASON ADAMS IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT**

Date: May 8, 2025  
Time: 8:15 a.m.  
Department: 8

Complaint Filed: August 17, 2020  
FAC Filed: August 30, 2024

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9 Attorneys for Plaintiffs Alvarado, Sarwar, and Rodriguez

1 I, Jason Adams, declare as follows:

2 1. I am an individual over the age of 18. I am a named plaintiff in the above-reference  
3 action. I have personal knowledge of the facts set forth below, except as to those matters stated on  
4 information and belief and, as to those matters, I believe them to be true. If called as a witness, I could  
5 testify competently as to the matters stated in this declaration.

6 2. In approximately 2015 I started working for Scholle IPN Packaging, Inc. as a forklift  
7 driver. Throughout my employment, I was paid on an hourly basis as a non-exempt employee. During  
8 my employment, the company failed to correctly calculate my regular rate of pay for purposes of paying  
9 overtime when I earned overtime and non-discretionary compensation in the same workweek.  
10 Specifically, the company failed to include all non-discretionary compensation, including without  
11 limitation, "Incentive" wages, when calculating the regular rate of pay for overtime purposes. As a  
12 result, the company failed to timely pay me all due wages or to timely pay all due wages upon separation  
13 of employment. As an additional result, the company failed to provide accurate, itemized wage  
14 statements to me with respect to overtime wage rates, gross wages earned, or net wages earned. The  
15 company independently failed to provide accurate, itemized wage statements to me when I was paid  
16 either overtime or shift premium wages by providing me with wage statements that did not identify the  
17 overtime rate as 1.5 times the regular rate of pay, the total hours worked, or the applicable rate of pay  
18 and applicable hours worked used to calculate shift premiums (such as Shift Premium and Shift Prem  
19 OT wages). The company also consistently failed to provide accurate, itemized wage statements  
20 identifying the name of my employer, as my wage statements named "Scholle Packaging, Inc.," even  
21 though no such entity exists on the California Secretary of State's website.

22 3. During the pendency of this lawsuit, I have done my best to represent the interests of the  
23 employees that are part of the class. I have actively contributed to the litigation of this case. My  
24 contributions include but are not limited to (i) participating in numerous telephonic meetings with my  
25 attorneys and their staff to discuss the case and review documents prepared on my behalf, (ii) providing  
26 my attorneys with information and documents regarding my employment with the company, (iii)  
27 searching for additional information and documents requested by my attorneys, (iv) reviewing and  
28 approving the written notice to the Labor and Workforce Development Agency, the complaint, other

1 papers filed with the court, (v) reviewing documents and information my attorneys were provided by the  
2 company or its attorneys, (vi) being available for a mediation, (vii) reviewing and executing the  
3 settlement agreement, and (viii) reviewing and signing the declarations submitted to this Court in  
4 support of the settlement.

5 4. I have taken all necessary steps to represent the interests of the Class, including by  
6 providing information and documents to my counsel, discussing the claims and lawsuit with my counsel,  
7 and answering any questions that have come up. I remain willing to devote my time to this lawsuit for  
8 the benefit of the Class. I do not believe I have any interests that are adverse to the interests of the Class.  
9 I also am unaware of any such issues having been raised or presented by anyone else.

10 5. I believe many employees would not sue their employer out of fear. I took on risks by  
11 bringing this lawsuit, and I understand that other people will benefit because of the actions that I have  
12 taken. I feel that it is a positive accomplishment, am proud of the result, and believe that the class  
13 settlement is fair, adequate, and reasonable.

14 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
15 true and correct. Executed this <sup>09</sup> day of December 2024, at Bossier City, Louisiana.

16 DocuSigned by:  
17 *Jason Adams*  
EC2E1B3903A3461...

Jason Adams