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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

JOSE CABALO, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

JONES LANG LASALLE AMERICAS,
INC., a Maryland corporation; and DOES
1 through 50, inclusive,

Defendants.

Case No.: 37-2020-00044322-CU-OE-CTL

(Assigned to the Hon. Ronald F. Frazier, Dept. C-65)

**DECLARATION OF JOSE CABALO IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: March 17, 2023

Time: 8:30 a.m.

Dept.: C-65

Complaint Filed: December 3, 2020

DECLARATION OF JOSE CABALO

I, Jose Cabalo, hereby declare and state as follows:

1. I am an individual over the age of 18. I am the named plaintiff in the above-reference action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I was employed by Defendant Jones Lang LaSalle Americas, Inc. ("Defendant") as a custodial supervisor from on or about August 1, 2017, until on or about October 27, 2020. During my employment with Defendant, I was paid hourly.

3. During my employment, I was underpaid overtime and double time wages. Specifically, I was regularly paid non-discretionary pay, including shift differentials such as "Shift @3%/HR" wages, that were not factored into the regular rate of pay for overtime or double time wages.

4. Similarly, I was also underpaid sick pay wages, which were paid to me at my base rate of pay instead of the correct, higher regular rate of pay. As such, I am owed additional sick pay wages as well.

5. I was not paid all wages owed to me at the end of my employment.

6. Furthermore, I was not issued accurate pay stubs. Given the underpayment of wages above, the wage statements issued by Defendant did not identify the accurate information regarding my wages.

7. During the pendency of this lawsuit, I was required to provide assistance to my attorneys, including discussing the case with them on numerous occasions and providing them with documents and information. I have spent a significant amount of time in connection with the assistance/prosecution of the claims in this lawsuit. I estimate that I spent approximately 20 to 22 hours in connection with the assistance/prosecution of the claims in this lawsuit. This includes engaging in numerous telephonic discussions with my counsel regarding the case, searching for and providing various documents relating to my claims, including my pay records, reviewing various files and pleadings in this case, including my PAGA letter, the complaint, the Settlement Agreement, and my declarations. Throughout this case, I have continuously been

1 kept apprised of the status of this case.

2 8. I understand that this action was brought on behalf of other similarly situated
3 employees of Defendant in the State of California, and thus I am acting as a representative for
4 the Class. As the class representative, I understand that it is my responsibility to act in the
5 Class's best interest and not my own. I agree that I will not put my own interests ahead of that of
6 the Class. Moreover, I am not aware of any conflicts that exist between my interest and the
7 interests of the Class that would impair or affect my ability to serve as representative for the
8 Class.

9 9. I have and continue to be willing to assist in the investigation of this matter as
10 well as make myself available for trial or any further proceeding in this matter as required to
11 represent the interests of the Class. I also understand my duties and responsibilities to the
12 proposed class and will carry out those duties as necessary.

13 10. I have discussed the terms of the settlement with my attorneys, and based on the
14 information provided, I believe the settlement to be fair, adequate, and reasonable for myself and
15 for the entire Class.

16 11. I am aware and have been aware from the inception of the case, that there is the
17 risk that if I do not win my case, then I could be liable for Defendant's litigation fees and costs. I
18 also understand that filing a case on my own behalf could have involved fewer costs and
19 resolved faster than filing a class action. I accepted that risk in this case.

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

24 13. In connection with the settlement, I also executed a general release of any and all
25 claims, including any rights I would have had under Civil Code § 1542, which was not required
26 of other Class Members.

27 14. I understand that because of my actions, many others have benefited by this case.
28 I feel that I took upon myself the risk of this lawsuit and achieved a result for my other former

co-workers who did not have to file suit.

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

Executed on this 16 day of February 2023, at Chula Vista, California.

DocuSigned by:

Jose Juan Cabalo

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Jose Cabalo