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Attorneys for Defendants,
BUTTON TRANSPORTATION, INC.
and BUTTON TRANSPORTATION, LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

JULIO C. POLAR, individually, and on behalf
of all others similarly situated,

Plaintiff,

vs.

BUTTON TRANSPORTATION, INC., a
California Corporation; BUTTON
TRANSPORTATION, LLC, a Louisiana
Limited Liability Company; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 21STCV02575

**DECLARATION OF SUSAN L. DOLD
REGARDING *CY PRES* RECIPIENT**

Hearing Date: May 31, 2023, 10:30 AM
Judge: Hon. Carolyn B. Kuhl
Department: 12
Action Filed: January 21, 2021
Trial Date: Not set

1 I, Susan L. Dold, declare as follows:

2 1. I am the Director of Finance and Director of Human Resources at Truckers Against
3 Trafficking (TAT). I have personal knowledge of the facts set forth in this declaration and could testify
4 competently to them if called upon to do so.

5 2. TAT is a nonprofit organization which promotes justice and the law for all Americans,
6 including Californians. As of the beginning of 2023, TAT has trained over 1.5 million individuals and
7 companies, including truck drivers, on how to spot and report human trafficking. TAT also trains
8 drivers to spot labor trafficking, in which individuals are forced to work for substandard wages,
9 including in the immigrant farmworker population. Labor trafficking in California is pervasive and
10 impacts numerous industries. A 2017 report from the International Labor Organization and the Walk
11 Free Foundation found that 82 percent of labor trafficking survivors work in manufacturing,
12 hospitality, construction, mining and agriculture and as domestic workers in households. Victims often
13 are people from vulnerable communities who lack access to stable housing, employment or social
14 safety nets, work visas or union memberships that would safeguard them from exploitation. Up until
15 now, California has done very little to track or prevent labor trafficking.

16
17 3. According to the Human Rights and State Courts Collaborative, California is
18 considered the worst state in the United States for human labor trafficking. Typically, labor
19 trafficking includes recruiting, transportation, and harboring an individual for labor services through
20 fraud, force, or coercion. Jobs are often characterized by overcrowded and unsanitary living, debt
21 bondage, nominal or no pay for work done, and document servitude. It often happens in homes and
22 work places, primarily perpetrated by traffickers of the same cultural origin and ethnicity as the
23 victims. This permits traffickers to utilize class hierarchy and cultural power to ensure victim
24 compliance.

25 4. TAT has no relationship with Robert L. Button or any interest in or involvement in
26 Button Transportation, Inc. or Button Transportation, LLC.

5. Neither Robert L. Button, Button Transportation, Inc., nor Button Transportation, LLC are sponsors of TAT, have any interest in TAT, or are involved in the governance of TAT.

6. Neither money nor anything of value will be given by TAT to Robert L. Button, Button Transportation, Inc., or Button Transportation, LLC as a result of TAT's status as a *cy pres* recipient in the above-captioned case.

I, Susan L. Dold, certify and declare under penalty of perjury that the above information is true and correct to the best of my knowledge, information and belief, and that this declaration was signed this 28 day of April, 2023 at Littleton, Colorado.


Susan L. Dold

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I, **Michelle Lazo**, am employed in the County of Los Angeles, State of California. I am over
4 the age of 18 and not a party to the within action. My business address is 2 North Lake Avenue, Suite
5 560, Pasadena, California 91101.

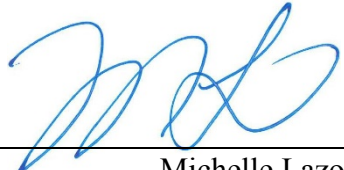
6 On, April 28, 2023, I served the foregoing document described as **DECLARATION OF**
7 **SUSAN L. DOLD REGARDING CY PRES RECIPIENT** on interested parties in this action as
8 follows:

9 Taras Kick, Esq.
10 taras@kicklawfirm.com
11 Roy K. Suh, Esq.
12 roy@kicklawfirm.com
13 Daniel J. Bass, Esq.
14 daniel@kicklawfirm.com
15 THE KICK LAW FIRM
16 815 Moraga Drive
17 Los Angeles, California 90049

18 √ **(VIA CASE ANYWHERE)** I caused such documents described herein to be uploaded
19 electronically onto the website www.caseanywhere.com per a mutual agreement between the
20 parties. I uploaded the above entitled document(s) with the understanding that all parties will
21 have access and be able to download said documents.

22 √ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the
23 above is true and correct.

24 Executed on April 28, 2023 at Norwalk, California.

25 
26 _____
27 Michelle Lazo
28

4861-3808-5727, v. 2