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 individually, and on behalf of all others
 7 similarly situated and aggrieved

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 9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

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

13 Plaintiff,

14 v.

15 BUTTON TRANSPORTATION, INC., a
 16 California corporation; BUTTON
 17 TRANSPORTATION, LLC, a Louisiana
 limited liability company; and DOES 1 through
 100, inclusive,

18 Defendants.
 19

Case No.: 21STCV02575

*[Assigned for all purposes to the Hon. Carolyn B.
 Kuhl, Dept. 12]*

Complex Class Action

**DECLARATION OF JULIO C. POLAR IN
 SUPPORT OF UNOPPOSED MOTION FOR
 FINAL APPROVAL OF CLASS AND PAGA
 REPRESENTATIVE ACTION SETTLEMENT**

Date: May 31, 2022

Time: 10:30 a.m.

Dept: 12

Complaint filed: January 21, 2021

FAC filed: April 20, 2021

Trial date: None set

DECLARATION OF JULIO C. POLAR

I, Julio C. Polar, hereby declare as follows:

1. I am the plaintiff and proposed Class Representative in the above-captioned class and representative action, *Polar v. Button Transportation, Inc., et al.*, Los Angeles County Superior Court, Case No. 21STCV02575.

2. I am over 18 years of age and make this declaration based on my personal knowledge. If called as a witness, I could and would testify competently thereto.

3. This declaration is submitted in support of the concurrently filed Unopposed Motion for Final Approval of Class Action and PAGA Representative Action Settlement.

4. I worked full-time for Button Transportation, Inc. and Button Transportation, LLC (“Defendants” or “Button Transportation”) as a non-exempt commercial truck driver from approximately August 10, 2020, to January 10, 2021. Button Transportation is a California-based commercial transportation company, and Robert L. Button is the CEO and owner of Button Transportation.

5. I seek to represent current and former non-exempt commercial truck drivers who worked for Defendants in California and were subject to the same uniform policies and procedures with respect to timekeeping and payroll.

6. I’m aware that bringing this lawsuit poses risks to my livelihood and potential future earnings in the transportation industry. I have noticed that since bringing my lawsuit, potential employers show less interest in hiring me after looking into my background. As a result, I have fewer employment options. One potential employer brought this to my attention by sending me a copy of a background report, which showed this lawsuit. Despite showing initial interest, that potential employer did not hire me. Nonetheless, despite my concern about how bringing this lawsuit might affect me, I believe that Defendants should be held accountable for how they treat their employees and decided to pursue these claims.

7. Before and during the litigation, I was advised by my attorneys about my duties and responsibilities as a representative for other current and former employees. I have taken these duties seriously and have been actively involved in my case throughout. I understand the factual allegations, and, as far as I am aware, my experience is typical of Defendants’ employees in California. I have no interest

1 that is adverse to, or even substantially different from, any other employee.

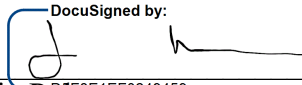
2 8. Throughout the litigation, I have maintained regular contact with my attorneys, provided
3 them with information when requested, and received updates from them. I spent substantial time and effort
4 looking for relevant documents and information to provide to my attorneys to assist with the case. My
5 attorneys kept me informed about all settlement negotiations and sought my opinion. I have reviewed the
6 proposed settlement and conferred extensively with my attorneys about its pros and cons. I was never
7 offered anything to serve as the class representative, and I understand that my duty to the class is ongoing
8 until the litigation is fully resolved. Ultimately, I believe the settlement is fair, adequate, and reasonable
9 because it holds Defendants accountable and will actually provide money to the proposed class, sooner
10 rather than later.

11 9. I understand that as part of the settlement, the parties propose that a portion of any
12 unclaimed funds be distributed to non-profit organizations Public Citizen Foundation and Truckers
13 Against Trafficking. I am not involved in any governance work of these organizations, and I have no
14 financial or other interest in either organization.

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16 I declare, under penalty of perjury under the laws of the State of California, that the foregoing is
17 true and correct to the best of my belief and knowledge.

18 Executed on May 5, 2023, in Fernley, Nevada.

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DocuSigned by:

Julio Polar ID: 8E1EF0249459...