

ELECTRONICALLY FILED
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County of San Benito
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By: Leticia Torres, Deputy Clerk

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

JOE BETANCUR, as an individual and on
behalf of all others similarly situated,

Plaintiffs,

v.

PRIDE CONVEYANCE SYSTEMS, INC.,
a California corporation; and DOES 1
through 50, inclusive,

Defendants.

CASE NO. CU-21-00022

**DECLARATION OF PLAINTIFF JOE
BETANCUR IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

Date: 11/13/2024
Time: 3:30 PM a.m/p.m.
Dept.: 1

I, Joe Betancur, declare as follows:

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

2. In or around December 2013, I began employment as a non-exempt employee for Defendant Pride Conveyance Systems, Inc. ("Defendant"). On or about July 9, 2020, my employment with Defendant ended. My last job title was Electrician Motor Prep Specialist. I worked for Defendant in Hollister, California. Throughout my employment, I believe I was not paid all sick pay, meal and rest period premium wages, and minimum and overtime wages owed, including based on my belief that Defendant did not pay me said wages based on the regular rate of pay, as well as for off-the-clock work. I also believe that I did not receive accurate itemized paystubs containing all information required by California law.

3. I estimate that I have spent approximately 60 hours in the prosecution of this action. I have taken all necessary steps to represent the interests of the Class, including by providing information and documents to my counsel, discussing the claims and lawsuit with my counsel, and answering any questions that have come up. I also met with my attorneys to prepare for my deposition and I sat for a whole day of my deposition. I remain willing to devote my time to this lawsuit for the benefit of the Class. I do not believe I have any interests that are adverse to the interests of the Class. I also am unaware of any such issues having been raised or presented by anyone else.

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

5
6 I declare under penalty of perjury under the laws of the State of California that the
7 foregoing is true and correct. Executed on August 21, 2024, at Los Banos, California.

Signed by:


369B6EDD4E52480

Joe Betancur