

AEGIS LAW FIRM, PC
SAMUEL A. WONG, State Bar No. 217104
KASHIF HAQUE, State Bar No. 218672
JESSICA L. CAMPBELL, State Bar No. 280626
CAROLYN M. BELL, State Bar No. 313435
9811 Irvine Center Drive, Suite 100
Irvine, California 92618
Telephone: (949) 379-6250
Facsimile: (949) 379-6251

Attorneys for Plaintiff Gerardo Velasquez, individually,
and on behalf of all others similarly situated.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

CAYLA BONDS, individually and on
behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act,

Plaintiff,

v.

CITRUS MOTORS ONTARIO, INC., a
California corporation and DOES 1
through 100, inclusive,

Defendants.

Case No. CIVSB2114893

*Assigned for all purposes to:
Hon. David Cohn; Dept. S-26*

**DECLARATION OF GERARDO
VELASQUEZ IN SUPPORT OF MOTION
FOR APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT REPRESENTATIVE
ACTION SETTLEMENT**

Date: July 12, 2022

Time: 10:00 a.m.

1 I, Gerardo Velasquez, declare as follows:

2 1. I have personal knowledge of the facts set forth herein and if called upon to testify, I
3 could and would do so competently under oath.

4 2. I make this declaration in support of my Motion for Approval of Private Attorneys
5 General Act Representative Action Settlement.

6 3. I worked for Citrus Motors Ontario, Inc. ("Defendant") as a non-exempt employee.

7 4. Through my attorneys, I filed this action on March 25, 2021, on behalf of myself and
8 all other non-exempt employees of Defendant.

9 5. With respect to the work I performed on the case, I participated in many conversations
10 with my attorneys, gathered and reviewed documents, and provided information related to my
11 working conditions and Defendant's company structure and operations. Throughout the course of this
12 case, I contacted my attorneys regularly for updates on the status of the case.

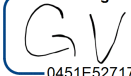
13 6. For mediation, I assisted my attorneys in preparation and strategy. I spoke with my
14 attorneys about the status of the case, its strengths and weaknesses, and I assisted them in evaluating
15 the claims and the potential damages for use at that mediation.

16 7. After mediation, I reviewed the settlement agreement and discussed the terms with my
17 attorneys. Based on my review of the settlement terms, conversations with my attorneys, and my
18 understanding of Defendant's operations, I believe the settlement in the case is fair and adequate and
19 in the best interest of the employees covered by the settlement.

20 8. Overall, I dedicated approximately 48 hours pursuing the PAGA representative claims
21 in this lawsuit.

22 9. When I decided to become involved in this lawsuit as a PAGA representative, I chose
23 to do so instead of pursuing my own claims in arbitration. I also understood that I might be responsible
24 for some or all of Defendant's legal costs if the case was not successfully concluded. Even with
25 knowledge of these risks, I was willing to go forward and to act on behalf of the State and aggrieved
26 employees, but I was nervous about losing and having a judgment filed against me for costs, or losing
27 job opportunities in the future.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct and that this declaration was executed on 6/9/2022, 2022 in
3 Ontario, California.

DocuSigned by:

0451E5271727489...

Gerardo Velasquez