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Attorneys for Plaintiffs,

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF ORANGE**

MANUEL FRANCO and ALFONSO
GUZMAN, on behalf of themselves, on behalf
of all persons similarly situated, and on behalf
of the State of California as a private attorney
general,

Plaintiffs,

vs.

STATES LOGISTICS SERVICES, INC., a
California Corporation, and DOES 1 through
50, inclusive,
Defendants.

Case No.: **30-2022-01239095-CU-OE-CXC**

DECLARATION OF ALFONSO GUZMAN

Hearing Date: July 24, 2025
Hearing Time: 2:00 p.m.

Judge: Hon. Layne H. Melzer
Dept.: CX102

DECLARATION OF ALFONSO GUZMAN

I, ALFONSO GUZMAN, declare as follows:

1. I am a named Plaintiff in this lawsuit. I am over 18 years of age and have personal knowledge of the facts described in this declaration. If called as a witness, I could and would testify competently to these facts.

2. I submit this declaration in support of the Motion for Final Approval of Class and Representative Action Settlement.

Background

3. I was hired by defendant STATES LOGISTICS SERVICES, INC. (“States Logistics”) to work as a loader and picker from approximately March of 2020 until January 20, 2021, at States Logistics’ warehousing, transportation, and packaging facility in Ontario, California.

4. While I worked for States Logistics, I followed the same timekeeping, scheduling, and payroll policies and practices of other employees I observed and interacted with.

5. While I worked for States Logistics, I was required to wait in long lines at the beginning of each shift, and when returning from lunch, off the clock and unpaid. At the beginning of my shifts, during the Covid-19 pandemic, I was also required to participate in screenings before clocking in, which we also had to wait in line for. I was also required to communicate with States Logistics via text while off the clock. I was also required to regularly use my cell phone for work, frequently as a calculator which was required for my job. I also sometimes traveled between work sites mid-shift using my own vehicle but was not paid mileage. While working in the facility, it would often get excessively hot which I believe created an unsafe work environment. When the facility was very hot and I felt like I needed a cool-down rest period, I was not allowed to take a break, which was challenging because my job as a loader and picker involved such physical labor. Even when we were able to take breaks, there wasn’t enough water provided and the bathroom facilities were not clean and often did not have soap and other necessary bathroom supplies. I observed that I was not the only one affected by these conditions.

DECLARATION OF ALFONSO GUZMAN

1 6. Because I believed I suffered these wage and hour violations working for States
2 Logistics and believe that other employees suffered similar violations, I wanted to file a lawsuit
3 on behalf of myself and similarly situated employees against Defendant. I hired the Law Offices
4 of Sahag Majarian, II, and Koul Law Firm, APC. I understand that my lawyers will share any
5 attorneys' fee award granted in this case, and I have been advised of and consented to this in
6 writing. I also understand that my lawyers have entered into a Joint Prosecution Agreement with
7 Blumenthal Nordrehaug Bhowmik De Blouw LLP, to work together on my case and I have
8 consented to this arrangement in writing as well. I understand that my attorneys will share fees in
9 this matter with 50% to Blumenthal Nordrehaug Bhowmik De Blouw LLP, 25% to Law Offices
10 of Sahag Majarian, II, and 25% to Koul Law Firm, APC.

11 7. Before filing this lawsuit, my attorneys made me aware of the obligations I had
12 serving as a class representative in this case. By deciding to serve as a class representative, I
13 understood and agreed to pursue not only my own wage and hour claims, but the claims of all other
14 class members, and, if necessary, to put their interests ahead of my own. I decided to file this case
15 as a class action partly because I believed that similarly situated employees were unlikely to be
16 aware of their rights or to pursue their claims individually because of the relatively small amount
17 of money in dispute for each individual worker.

18 8. My attorneys explained the risks associated with this lawsuit, and that the case
19 could take years to resolve, and therefore required a long-term commitment on my part, which it
20 did. I have been working with my attorneys on this case since 2021. I also understood that future
21 employers, especially in my industry, may not hire me if they knew I had sued States Logistics,
22 and that this information is available online for future employers to look up on the internet. I also
23 understood that I could potentially be responsible for paying attorneys' fees and costs if States
24 Logistics prevailed in this lawsuit. However, I accepted those risks because I believed filing this
25 lawsuit was the right thing to do.
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DECLARATION OF ALFONSO GUZMAN

Class Representative Service

9. As a class representative in this case, I also understood that it was my job to act as a fiduciary to absent class members. Therefore, I wanted the best possible result to be obtained for the class and I believe a great result was, in fact, achieved through the settlement the parties reached.

10. I have no interests that are against or not in the best interest of the class members in this case.

11. I believe that I have adequately served as a class representative in this case and will continue to do so until its conclusion.

12. Before this lawsuit was filed, I had several conversations with my attorneys. Among other things, I discussed with them Defendant's practices and how they applied to me and class members. I also spent significant time gathering documents for my attorneys, provided them with information, and answered their questions so that they could analyze everything I provided them and assess the strength of my claims. I kept records of the wrongful employment practices, including communications, I experienced and received during my employment. I believe my records and information was very helpful to my attorneys.

13. Before mediation, I conferred with my attorneys, and I made myself available during the entirety of the full-day mediation. Although I did not keep exact records of the time I spent working on my case, I would estimate that I spent at minimum 25-30 hours advancing this case. In addition to this time spent looking for documents and working with my attorneys, I had to prepare for and have my deposition taken. To prepare for my deposition, I met with my attorneys over zoom videoconference the night before around 6:00 pm. I also had my deposition taken over zoom videoconference and I was asked questions for over 3 hours. I had to leave work early, at or around 10:30 am for my 1:00 pm deposition. I happened to be stationed to work in San Diego so I was only able to work a partial day before driving back to my home in Rancho Cucamonga. I was earning \$34 per hour and I missed at least 6 hours of work to sit for my deposition.

DECLARATION OF ALFONSO GUZMAN

1 14. After discussing the risks, benefits, and alternatives of continued litigation, I
2 agreed to settle this lawsuit on behalf of myself and other class members. I have been advised of
3 the terms of the settlement of this case, and in light of the risks and uncertainties in proceeding
4 with this lawsuit, I believe it is fair and reasonable and in the best interests of my coworkers.

5 15. I am aware that Defendant denies the allegations in this lawsuit and that there has
6 been no determination that Defendant is actually liable for any of the alleged violations. I also
7 understand that there are many risks and uncertainties involved in continuing to pursue this case.

8 16. I entered into an individual settlement agreement with Defendant. I understand that
9 the Court has requested to see the individual settlement and that my attorneys will be submitting
10 the agreement to the court confidentially. I had individual claims for race-based discrimination,
11 harassment, hostile work environment, and constructive termination that applied only to me and
12 not the rest of the class. I also reported safety violations for which I believe I was retaliated against.

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15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct. Executed at Ranch Cucamonga, California.

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18 6/20/2025

19 DATE

DocuSigned by:


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ALFONSO GUZMAN

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DECLARATION OF ALFONSO GUZMAN