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8 individually, and on behalf of all others similarly
situated

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12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 FOR THE COUNTY OF LOS ANGELES

14 JOAQUIN ROJAS, individually, and on
15 behalf of all others similarly situated,

16 Plaintiff,

17 vs.

18 JAR TRANSPORTATION INC., a
19 California Corporation, RAYMOND
20 PAUL JUNE, an individual, FEDEX
GROUND PACKAGE SYSTEM, INC., a
21 Delaware corporation; and DOES 1
through 20, inclusive;

22 Defendants.
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CASE NO. 21STCV15613

**DECLARATION OF JOAQUIN
ROJAS IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: June 15, 2023

Time: 11:00 a.m.

Department: 11

Complaint Filed: April 26, 2021
Consolidated with 21STCV41706

DECLARATION OF JOAQUIN ROJAS

I, JOAQUIN ROJAS, declare:

1. My name is Joaquin Rojas, and I am over the age of 18. I am the Named Plaintiff who filed the above-captioned lawsuit. I have personal knowledge of the facts contained herein, and if called as a witness, could and would competently testify to the following matters.

2. I understand that this declaration is submitted in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement.

3. I worked for Defendants JAR Transportation Inc. and Raymond Paul June (together, "Defendants") as a non-exempt, hourly delivery driver from approximately April 2020 to January 2021.

4. While working for Defendants, I did not believe I received all of my compliant meal and rest periods and did not believe I was properly compensated for the time I worked. Based on these facts, I decided to bring this lawsuit and agreed to act as the class representative in this matter. I understood that I could bring my own individual wage claims but decided that it would be best for other current and former employees of Defendants if I acted as their representative.

5. In other words, I chose to forego bringing my wage claims individually, which could have been resolved much earlier, in order to help benefit other class members. Waiting for a settlement in this case has been a hardship for me. Also, acting as the representative and as a Plaintiff in a lawsuit against my former employer was a personal sacrifice that I was willing to take for the benefit of the other employees of Defendants as it is my understanding this lawsuit could not have been prosecuted or settled unless I or some other employee decided to serve as a named plaintiff and pursue the case. In deciding to serve as a named plaintiff, I understood that my name would be publicly attached to this lawsuit and that my work experiences to some extent would be set forth in a public court file. I recognized that I would need to devote a certain amount of time that I could have spent otherwise. I also recognized that my bringing the lawsuit carried some degree of risk. Despite this, I decided to serve as the named plaintiff without any promise of recovery or compensation.

6. I am familiar with the work involved in prosecuting this case and did a number of

1 things to assist my attorneys in this case. Specifically, I met with the attorneys before the lawsuit
2 was filed and discussed my experience working for Defendants at length. I also searched for all
3 documents I had related to my employment with Defendants. During the litigation I remained in
4 close contact with my counsel and engaged in numerous telephone conversations regarding the
5 claims in the case and Defendants' defenses to those claims. I also had numerous conversations
6 with my counsel regarding the potential of the lawsuit, as well as the terms of the ultimate
7 Settlement Agreement which I reviewed the drafts thereof. I would estimate that as of this
8 declaration I have spent well over 60 hours assisting my attorneys in litigating this case against
9 Defendants.

10 7. I believe I have fulfilled my duties as a named plaintiff and class representative,
11 which required a significant amount of time and effort during the course of this case. These efforts
12 required dedicating numerous hours to lawsuit activities including, but not limited to: (a)
13 communicating with my attorneys to stay informed of ongoing developments in the case; (b)
14 searching for and providing documents and other materials relating to my work experience; (c)
15 responding to requests for information relating to my work experience; (d) assisting in the
16 preparation of settlement discussions and mediation; and (e) participating in the settlement
17 discussions and reviewing filings and key documents including drafts of the complaint, the
18 settlement agreement, and notices. I believe I have been diligent and that I have acted above and
19 beyond that of which is expected of a named plaintiff to date and will continue to do so.

20 8. I believe that the proposed settlement obtained on behalf of the other employees is
21 excellent in view of the issues and risks involved with the case. Based on my counsel's
22 recommendations in this case and my understanding of the risks and costs associated with trial, I
23 believe the settlement achieved is fair and reasonable and in the best interests of the aggrieved
24 employees in this case.

25 9. I also believe the service award being requested on my behalf is fair and reasonable.
26 I chose to forego pursuing my wage and hour claims individually to obtain a benefit on behalf of
27 others. In doing so, I had to postpone receiving proper compensation from the Defendants, take
28 time and risks that other current and former employees did not, and had to be a party to a lawsuit

1 that is stressful due to the litigation itself and fear that other future employers may find out about
2 this case. I also had to execute a general release of all claims against Defendants, including waiving
3 all rights under California Civil Code section 1542, which is something other class members did
4 not have to do.

5 10. I will continue to assist my counsel and my fellow class members as this case
6 progresses forward and am ready and able to serve as the class representative in this action
7 regardless of outcome or burden placed on me to do so.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing
9 is true and correct. Executed 05 / 09 / 2023, at Van Nuys, California.

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Joaquin Rojas