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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES- SPRING STREET COURTHOUSE

AMIT SINGH , individually, and on behalf of
other members of the general public similarly
situated, and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiff,

vs.

RYDER TRUCK RENTAL, INC., a Florida
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 21STCV22972

Honorable Stuart M. Rice
Department SSC-1

CLASS ACTION

**DECLARATION OF AMIT SINGH IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Helene Mayer); and [Proposed]
Order filed concurrently herewith]

Complaint Filed: June 17, 2021
FAC Filed: May 12, 2022
Trial Date: None Set

DECLARATION OF AMIT SINGH

I, **Amit Singh**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Ryder Truck Rental, Inc. (“Ryder Truck Rental”) as an hourly-paid Technician and Technician II from approximately October 2006 to approximately October 2020. I decided to seek legal advice about my work experiences with Ryder Truck Rental and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Ryder Truck Rental paid me and other employees what was owed to us and was held accountable for its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. I consulted with the attorneys at Lawyers *for* Justice, PC including discussing my situation, wage-and-hour class actions in general, and what it meant to be a named plaintiff, class representative, and eventually a PAGA representative.

3. I have spent a substantial period of time reviewing the case materials and fulfilling my responsibilities as a named plaintiff, class representative, and PAGA representative, which included gathering documents concerning my employment with Ryder Truck Rental, reviewing documents from my attorneys, and providing my input.

4. As the case progressed, I spent significant time reviewing Ryder Truck Rental’s discovery requests, locating documents, and providing documents, responses, and supplemental responses to my attorneys.

5. On June 12, 2023, I attended a full day deposition. I spent considerable time preparing for the deposition and traveling to and from the deposition. After the deposition, I spent additional time reviewing my testimony and discussing the contents of the deposition with my attorneys.

6. As far as the settlement is concerned, I spent an enormous amount of time reviewing the settlement documents and asking questions and discussing the settlement with my attorneys before signing the settlement agreement.

7. I think my efforts helped to get the result obtained in this case, and as a class and PAGA representative, I respectfully request that the Court award me an enhancement payment in the amount of \$15,000.00 for my participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

8. I am not related to anyone associated with Lawyers *for* Justice, PC.

9. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement payment, consideration for providing a general release of claims to Defendant as disclosed to the Court and contained in the class notice, and my share of the settlement as a class member and aggrieved employee.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 12, 2024 at Hawthorne, California.

Electronically Signed 2024-11-12 20:52:35 UTC - 172.58.211.53



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Amit Singh