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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

ADEWUNMI OJO, as an individual and on
behalf of all others similarly situated,

Plaintiffs,

vs.

PINNACLE LIGHT INDUSTRIAL, LLC;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: 30-2021-01201515-CU-OE-CXC

**DECLARATION OF ADEWUNMI OJO IN
SUPPORT OF PLAINTIFF'S NOTICE OF
MOTION AND MOTION TO APPROVE
SETTLEMENT AGREEMENT PURSUANT
TO THE PRIVATE ATTORNEYS
GENERAL ACT**

Date: November 18, 2022

Time: 8:30 a.m.

Dept.: CX101

Complaint Filed: May 19, 2021

Trial Date: None

1 I, Adewunmi Ojo, declare as follows:

2 1. I am an individual over the age of 18. I am the named Plaintiff in the above-
3 referenced action. I have personal knowledge of the facts set forth below and if called to testify I
4 could and would do so competently.

5 2. I was hired by Pinnacle Light Industrial, LLC (the “Company”) as a field engineer
6 in or about 2015. Throughout my employment with the Company, I have been as an hourly, non-
7 exempt employee.

8 3. Prior to June 27, 2021, I did not believe that the Company timely paid wages at
9 the end of the pay period. For example, on April 30, 2021, I received payment of the wages I
10 earned during the pay period of April 11, 2021 through April 17, 2021. This was more than 10
11 days after the end of the pay period.

12 4. Additionally, I believe that I was not fully reimbursed for mileage expenses
13 related to the use of my personal vehicle for work related purposes. While some miles were
14 reimbursed around the IRS recommended reimbursement rate, the Company used a much lower
15 reimbursement rate for miles driven in excess of 225 during the workweek. In or around
16 September 11, 2021, the Company changed its practices and stopped using the reduced rate.

17 5. I understand that this action was brought on behalf of other employees within the
18 State of California, and thus I am acting as a representative for these employees. I do not believe
19 I have any interests that are adverse to the other individuals employed by the Company.

20 6. Throughout this case, I have continuously been kept apprised of the status of this
21 case. I spent a significant amount of time in connection with the prosecution of the claims in this
22 lawsuit. This includes engaging in numerous telephonic discussions with my counsel regarding
23 the case, searching for and providing various documents relating to my claims, including my pay
24 records, reviewing my PAGA letter, the complaints, the Joint Stipulation of Settlement and
25 Release Under the Private Attorneys General Act (“Agreement” or “Settlement Agreement”),
26 and my declaration.

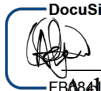
27 7. I am proud of the result and accomplishment of this lawsuit. I feel that it is a
28 positive accomplishment and understand that other people will benefit because of the actions that

1 I have taken.

2 8. I understood that filing this lawsuit is a public record and I accepted that burden.
3 Since this lawsuit is a public record, it is something that potential employers can look into, and it
4 may cause a negative impact to my employment prospects.

5 9. I executed a general waiver of any and all claims, known and unknown, including
6 a waiver of California Civil Code § 1542, which I understand was not required of other
7 employees.

8 I declare under penalty of perjury that the foregoing is true and correct. Executed on
9 October 17, 2022, at Murrieta, California.

10 DocuSigned by:
11 
12 FBAB412B7018415

Adewunmi Ojo