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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

MAHO LAZO, individually, and on behalf of all
others similarly situated,

Plaintiff,

v.

PROTERRA OPERATING COMPANY, INC., a
corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No. 21STCV30663

*[Assigned for all purposes to: Hon. Yvette M.
Palazuelos, Dept. 9]*

**DECLARATION OF MAHO LAZO IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Date: October 5, 2023
Hearing Time: 10:00 a.m.
Hearing Place: Department 9

DECLARATION OF MAHO LAZO

I, Maho Lazo, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

2. I am the named Plaintiff in this action and submit this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement. Because I believe I have provided invaluable assistance during the course of this case, I am hopeful that the Court will approve my request of a \$7,500 service payment for my role as a Class Representative.

3. I am a former employee of Proterra Operating Company, Inc. ("Proterra"). I worked at Proterra from approximately September 2019 to approximately May 2020 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to Proterra's policies and practices that have been alleged as unlawful in the Class Action Complaint and First Amended Class Action Complaint.

4. I started this lawsuit because I was concerned that I was not paid properly for all the hours that I worked. I also was concerned that Proterra did not provide me all of my meal breaks and rest breaks. While working at Proterra, my coworkers and I were often asked to work long hours because of the amount of work that the company needed us to perform, and we sometimes were not paid for all hours or provided with all of our breaks.

5. By initiating this lawsuit, I hoped that I might be able to change Proterra's policies to better protect the working conditions of my co-workers and provide monetary relief to Proterra's hourly-paid and non-exempt employees. I also understood it was my duty as a Class Representative to represent the best interests of the class, know about the lawsuit, help my attorneys, and keep updated on the case.

6. Prior to commencing this case, I provided Wilshire Law Firm with a detailed account of the facts related to my employment with Proterra. Additionally, I provided my counsel with documentation in the form of pay statements and other policy documents that applied to my employment with Proterra. Based on my conversations, my attorneys and I were able to identify instances when I was not paid correctly.

1 7. I have invested a lot of personal time and energy while this lawsuit has been
2 pending. I made it a priority to be actively involved because I wanted to do everything I can to
3 assist my attorneys in prosecuting this case. I regularly communicated with my attorneys and
4 their staff to discuss updates on the case and to provide my attorneys with additional information.

5 8. I spent many hours looking for documents that my attorneys asked me to provide
6 to help this case, including pay stubs and policy-related documents.

7 9. I also made myself available during the mediation for this case and I kept in
8 regular contact with my attorneys before and after the mediation to ensure that any questions the
9 attorneys had could be answered.

10 10. I also reviewed pleadings filed in this case, including the settlement-related
11 documents.

12 11. If the Court requests, I can provide additional information about my adequacy as a
13 class representative for this case. I also intend to file an updated declaration in advance of the
14 motion for final approval hearing.

15 12. I believe the settlement is a good settlement and I would recommend that the
16 Court approve it because I believe that this settlement is fair, adequate, and reasonable. I have
17 also observed my attorneys' work throughout this case and I believe they have been thorough,
18 diligent, prompt, courteous, and professional. I respectfully request that the Court award me a
19 \$7,500 service payment. I am receiving no additional compensation other than the compensation
20 provided for in the settlement. Based on my involvement in this case and the benefits provided
21 to my former co-workers, I can say I helped stand up for the other workers who may have been
22 too afraid to say anything to management because they did not want to risk losing their jobs or
23 risk the stigma of suing an employer. I was not afraid to take that risk because I strongly care
24 about helping out my current and former co-workers. I also continue to fear that any employer
25 may find out that I participated in this lawsuit and hold it against me, especially considering that
26 my name is on this lawsuit. In a competitive job market, this factor may weigh heavily against
27 me. Nevertheless, I felt that important rights were at stake that hurt myself and other employees.

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1 I declare under penalty of perjury, under the laws of the State of California and the United
2 States of America, that the foregoing is true and correct.

3 Executed on 5/26/2023 at Palmdale, California.

4 DocuSigned by:
Maho Lazo

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6 Maho Lazo

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