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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

CHRIS N. DILLER, EDWARD SANDOVAL,	)	CASE NO. 34-2020-00281372
and ISRAEL CRUZ CHAN, on behalf of	)	
themselves and all others similarly situated;	)	CLASS ACTION
	)	
Plaintiffs,	)	DECLARATION OF EDWARD
vs.	)	SANDOVAL IN SUPPORT OF
	)	MOTION FOR FINAL APPROVAL OF
GOLDEN STATE SUPPLY LLC, a Nevada	)	CLASS ACTION SETTLEMENT
Limited Liability Company; WORLDWIDE	)	
AUTO PARTS, INC., a Corporation; and	)	Date: September 29, 2023
DOES 1-100, Inclusive,	)	Time: 9:00 a.m.
	)	Dept.: 27

Defendants.) Judge: Hon. Jill Talley
)
) Complaint filed: July 1, 2020
) Trial Date: None
)
) **UNLIMITED CIVIL CASE**
)
_____)

I, Edward Sandoval, declare:

1. I am over eighteen years old and unless the context indicates otherwise, I have personal knowledge of the following facts and if called as a witness, I could and would testify competently to them. I am a Class Representative in the above-captioned action against Defendants, GOLDEN STATE SUPPLY LLC, and WORLDWIDE AUTO PARTS, INC (“Defendants”). I make this declaration in support of the Motion for Final Approval of Class Action Settlement, Attorneys’ Fees Award, and Class Representative Enhancement Payments.

2. I am currently not a party to, nor have I been a party to at any time during the course of this litigation, any cases which are similar to the above-entitled case pending in other jurisdictions or courts.

3. I contacted the attorneys at Schoech Law Group (“SLG”) and Van Dyke Litigation & Trial Attorneys, PC (“VDLTA”) after the original complaint was filed in this action. I discussed my complaints and concerns about my time working for Defendants and reviewed the operative complaint. After doing it it was determined that my claims were complimentary to those already being asserted by Chris Diller and retained SLG and VDLTA to represent me.

4. I learned through my attorneys that I would need to provide them attorneys with the underlying facts of the case (policies and practices relating to meal and rest breaks and documentation to determine the amount of unpaid wages), review pleadings, respond to discovery, potentially sit for deposition, participate in settlement discussions, approve any settlement that was

1 reached, and attend and testify at trial, if necessary.

2 5. I understood and recognize that I would be involved in a class action suit and that
3 I would be a class representative seeking compensation not just for myself, but for all other past
4 and present employees of Defendants.

5 6. I also understood the risks of litigation, including being potentially liable for
6 Defendants' fees and costs if the lawsuit was unsuccessful, that the lawsuit could continue for
7 several years, and that it would be public knowledge that I was involved in a class action lawsuit.
8 I also understood that my own claim for damages would be delayed because I was proceeding in
9 an action for all other past and present employees in my position. Even with this knowledge, I was
10 willing to serve as class representative because I believed Defendant owed me and other employees
11 for missed meal and rest breaks and unpaid wages.
12
13

14 7. After multiple conversations and emails with my attorneys regarding the facts of
15 my case, my attorneys provided me with a draft of the First Amended Complaint to ensure the
16 completeness and accuracy of the allegations.
17

18 8. After being added to the First Amended Complaint I continued to work with my
19 attorneys to develop the facts of the case. And, I often contacted my attorneys to stay current on
20 the status of the litigation, and to discuss my attorneys' progress in prosecuting the claims.

21 9. I was also actively involved in the litigation process and worked with the attorneys
22 to prepare discovery responses, provide settlement authority necessary to assist with the settlement
23 negotiations, conferred with my attorneys' during the mediation, remained on-call during the
24 negotiations and spoke to my attorneys throughout the process. I ultimately approved of the
25 settlement that was reached as a result of the negotiations.
26

27 10. I have carefully reviewed the terms of the proposed settlement. I accepted the
28

1 settlement only after I had spent time evaluating the proposed outcome to assure that it was fair.
2 Based on my attorneys' evaluation and recommendation, and my own review, I believe the
3 settlement is fair and reasonable and adequately compensates Class Members, and my support for
4 the settlement is not contingent upon my receipt of an Enhancement Payment.

5 11. In summary, over the last three years I have been continually involved in this
6 litigation since this case was filed, and over the course of this litigation I have spent a significant
7 amount of time conferring and working with my attorneys on the prosecution of my claims,
8 responding to their inquiries, and evaluating the settlement and related documents.

9 12. I believe my negotiated Enhancement Payment is reasonable compensation for my
10 services on behalf of Class Members, and for the general release that I am required to provide
11 Defendants as a condition of settlement, which has independent value and which I believe makes
12 up a major fraction of the value of the Enhancement Payment. The Enhancement Payment is thus
13 fair and reasonable compensation for my effort in bringing the action, assisting my attorneys with
14 the litigation, regularly conferring with my attorneys on the status of the case and the strategies for
15 prosecuting the claims, reviewing the proposed settlement to ensure that its terms are fair, and
16 providing Defendant with a general release of all claims I may have against it.

17 13. I understand that an Enhancement Payment is not guaranteed and is subject to court
18 approval. My opinion about the fairness of the settlement is no based on this potential payment.

19 14. I believe I did the right thing in pursuing this case and while I have paid a price for
20 the greater good of the other past and present employees, I believe we will now obtain some relief
21 through the terms of the proposed settlement.

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct, and that this declaration was executed on Sep 5, 2023 at
24

1 Sacramento, California.

Edward Sandoval

Edward Sandoval (Sep 5, 2023 17:18 PDT)

Edward Sandoval

Motion for Final Approval.SANDOVAL DEC

Final Audit Report

2023-09-06

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