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Attorneys for Plaintiff and the Class

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

RENE VELASQUEZ, as an individual and on
behalf of all others similarly situated, and as a
private attorney general,

Plaintiff,

vs.

AIR TRANSPORT INTERNATIONAL, INC., a
Delaware corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 34-2021-00307289

[Assigned for all purposes to Department 25,
Hon. Jill H. Talley]

**DECLARATION OF RENE VELASQUEZ IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

*[Filed concurrently with Notice of Motion and
Motion for Preliminary Approval of Class Action
Settlement; Declaration of Larry W. Lee;
Declaration of Simon L. Yang; Declaration of
William L. Marder; [Proposed] Order]*

Date: June 3, 2022
Time: 9:00 a.m.
Department: 25

Reservation No.: 2638229

Complaint Filed: September 1, 2021

1 I, Rene Velasquez, declare as follows:

2 1. I am an individual over the age of 18. I am the named plaintiff in the above-reference
3 action. I have personal knowledge of the facts set forth below, except as to those matters stated on
4 information and belief and, as to those matters, I believe them to be true. If called as a witness, I could
5 testify competently as to the matters stated in this declaration.

6 2. Until July of 2021, I worked for Air Transport International, Inc. as an aircraft mechanic.
7 Throughout my employment, I was provided wage statements that did not show "Air Transport
8 International, Inc." or show the company's address.

9 3. I have taken all necessary steps to represent the interests of the Class, including by
10 providing information and documents to my counsel, discussing the claims and lawsuit with my counsel,
11 and answering any questions that have come up. I remain willing to devote my time to this lawsuit for
12 the benefit of the Class. I do not believe I have any interests that are adverse to the interests of the Class.
13 I also am unaware of any such issues having been raised or presented by anyone else.

14 4. I believe many employees would not sue their employer out of fear. I took on risks by
15 bringing this lawsuit, and I understand that other people will benefit because of the actions that I have
16 taken. I feel that it is a positive accomplishment, am proud of the result, and believe that the class
17 settlement is fair, adequate, and reasonable.

18 5. I understand that the attorneys' fees awarded in this action will be split 65% to Diversity
19 Law Group, P.C. and 35% to Polaris Law Group.

20 I declare under penalty of perjury under the laws of the State of California that the foregoing is
21 true and correct. Executed this 13 day of April 2022, at Roseville, California.

22 DocuSigned by:

23 

24 D44B68695657484

Rene Velasquez