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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
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: January 6, 2023
Time: 9:00 a.m.
Department: 25

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. I am informed and believe that such wage
9 statements failed to comply with the applicable legal requirements.

10 3. During the pendency of this lawsuit, I have done my best to represent the interests of the
11 employees that are part of the class. I have actively contributed to the litigation of this case. I estimate
12 that I have spent nearly 30 hours in connection with the litigation of this case. My contributions include
13 but are not limited to (i) participating in numerous telephonic meetings with my attorneys and their staff
14 to discuss the case and review documents prepared on my behalf, (ii) providing my attorneys with
15 information and documents regarding my employment with Defendant; (iii) searching for additional
16 information and documents requested by my attorneys, (iv) reviewing and approving the written notice
17 to the Labor and Workforce Development Agency and the complaint filed in court; (v) reviewing and
18 executing the settlement agreement; and (vi) reviewing and signing the declarations submitted to this
19 Court in support of the settlement.

20 4. I understand that the class claims alleged in this action were brought on behalf of other
21 similarly situated employees, and thus I am acting as a representative for the Class. I understood that an
22 individual case would have resolved much faster than a class action and involved much less financial
23 risk than a class action.

24 5. Throughout the lawsuit, I have been kept apprised of the status of this case. As the class
25 representative, I understand that it is my responsibility to act in the Class's best interest and not my own.
26 I agree that I will not put my own interests ahead of that of the Class. Moreover, I am not aware of any
27 conflicts that exist between my interest and the interests of the Class that would impair or affect my
28 ability to serve as representative for the Class.

5 7. I have discussed the terms of the settlement agreement with my attorneys, and based on
6 my understanding of the case, I am of the opinion that settlement for the consideration and on the terms
7 set forth in the settlement agreement are fair, reasonable, and adequate, and in the best interests of the
8 Class.

9 8. I understood that filing this lawsuit is a public record and I accepted that burden. This
10 lawsuit is something that potential employers can look into, and which may cause a negative impact of
11 my employment prospects. I also understood that there were risks due to my involvement as a named
12 plaintiff in a representative lawsuit against a large employer. For instance, if I lost, I might have to face a
13 judgment for some of Defendant's legal costs. Even understanding all these risks, I was willing to move
14 forward and bring this case on behalf of the other employees.

15 9. As part of the settlement, I also agreed to sign a general release of claims and a waiver of
16 Civil Code section 1542.

17 I declare under penalty of perjury under the laws of the State of California that the foregoing is
18 true and correct. Executed this 10 day of December 2022, at Roseville, California.

Rene Velasquez

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⁸⁴Rene Velasquez