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Attorneys for Plaintiffs and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

GILBERT CHAVEZ, JESSE CHAVEZ,
individually, and on behalf of other members
of the general public similarly situated and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act; EVODIO VALLES,
individually, and on behalf of other members
of the general public similarly situated;

Plaintiffs,

vs.

KSC & SON CORPORATION, an unknown
business entity; CHANDI GROUP USA, an
unknown business entity; NACHHATTAR
S. CHANDI, an individual; and DOES 1
through 100, inclusive,

Defendants.

Case No.: CIVSB2124237 (Lead Case)
Consolidated Case No.: CIVSB2126976

Honorable Christian Towns
Department S26

CLASS ACTION

**DECLARATION OF JESSE CHAVEZ
IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT,
ATTORNEYS' FEES AND
LITIGATION COSTS, AND
INCENTIVE AWARDS**

Date: December 3, 2025
Time: 8:30 a.m.
Department: S26

Complaint Filed: August 20, 2021
FAC Filed: September 12, 2024
Trial Date: None Set

DECLARATION OF JESSE CHAVEZ

I, **JESSE CHAVEZ**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by KSC & Son Corporation and/or Chandi Group USA, Inc. (together, "Defendants") as an hourly-paid Car Washer from approximately May 2017 to approximately March 2021. I decided to seek legal advice about my work experience with Defendants. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

1 4. In addition, I assisted my attorneys in preparing responses to Defendants' Special
2 Interrogatories (Set One); Form Interrogatories - General (Set One); and Form Interrogatories –
3 Employment Law (Set One) and producing responsive documents. I prepared and appeared for
4 my deposition in connection with this matter on August 24, 2023. Subsequently, I spent time
5 reviewing my deposition transcript.

6 5. Throughout this matter, I was available to answer any questions my attorneys had,
7 and available to speak and meet with my attorneys whenever they needed me. I responded to
8 them as quickly as possible and gave them as much information and identified as many
9 documents as I could. I spent time speaking with my attorneys about the case, identifying
10 potential witnesses, providing my attorneys with documents and information concerning the
11 case, and also describing policies, practices, and procedures of Defendants.

12 6. As far as the settlement is concerned, I was available to review documents and
13 answer any questions my attorneys had. I reviewed the Term Sheet and the Settlement
14 Agreement and discussed the questions I had regarding the potential settlement with my
15 attorneys before signing the settlement papers.

16 7. I think my efforts helped to get the result obtained in this matter, and as a
17 potential class and PAGA representative, I respectfully request that the Court award me an
18 incentive award for my efforts in pursuing and participating in this matter, as well as my broader
19 release of claims. Taking into consideration the time that I have dedicated to this matter, I
20 believe that this amount is reasonable.

21 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

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1 9. I have not entered into any undisclosed agreements, nor have I received any
2 undisclosed compensation in this matter. The only compensation I will receive is whatever
3 amount the Court awards as an incentive award, as well as my share of the settlement as a class
4 member and aggrieved employee.

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct.

7 Executed on this day March 1, 2025, at San Bernardino, California.

8 The image shows a rectangular box containing an electronic signature. The signature is a stylized, handwritten-style mark in black ink. Above the signature, the text "Electronically Signed" is visible. To the right of the signature, the date and time "2025-03-01 03:25:34 UTC - 172.56.182.163" are displayed. Below the signature, the text "iText AssuranceSign" is visible. To the right of the signature, a long alphanumeric string "67500aa9-208d-4309-9e98-b2910140395" is displayed.

9 Jesse Chavez
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