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14 Attorneys for Plaintiff ARNOLD GARCIA,
on behalf of himself, all others similarly
15 situated, and on behalf of the general public

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

17 **IN AND FOR THE COUNTY OF ALAMEDA**

18 ARNOLD GARCIA, on behalf of himself, all
19 others similarly situated, and on behalf of the
general public,

20 Plaintiffs,

21 v.

22
23 MCCOLLISTER'S TRANSPORTATION
SYSTEMS, INC.; MCCOLLISTER'S
24 GLOBAL SERVICES, INC.;
MCCOLLISTER'S AUTO TRANSPORT,
25 LLC; and DOES 1-100,

26 Defendants.
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Case No. RG21112345

[Consolidated with Case No. RG21112189]

**DECLARATION OF HUNTER PYLE IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT,
CONDITIONAL CERTIFICATION,
APPROVAL OF CLASS NOTICE,
SETTING OF FINAL APPROVAL
HEARING DATE**

Date: April 11, 2023

Time: 9:15 a.m.

Reservation ID: 439395595321

1 I, Hunter Pyle, declare as follows:

2 1. I am a member in good standing of the Bar of the State of California and the
3 principal of Hunter Pyle Law in Oakland, California. I am co-counsel of record in this lawsuit
4 (“Action”).

5 2. I have personal knowledge of the facts set forth in this declaration and could and
6 would testify competently to them.

7 **BACKGROUND AND EXPERIENCE**

8 3. In 1997, I received a J.D. from Boalt Hall School of Law at the University of
9 California at Berkeley.

10 4. As a law student, I clerked for Professor David Feller, one of the premier scholars in
11 the field of labor and employment law. I also worked as a law clerk at Eggleston, Siegel &
12 Lewitter; Beeson, Tayer & Bodine; and Davis, Cowell & Bowe. Each of these firms represents
13 employees in the labor and employment context.

14 5. I have been practicing law since December 1997. From December 1997 through
15 October 2003, I was an associate at Siegel & Yee in Oakland, where I focused my practice mainly
16 on employment law. In that capacity, I was the primary attorney for numerous employment law
17 cases that resolved prior to trial, handling all aspects of these cases. Additionally, I served as
18 second chair in approximately ten trials.

19 6. In October 2003, I left Siegel & Yee and became a partner at Sundeen Salinas &
20 Pyle. In 2017, I left Sundeen Salinas & Pyle and created Hunter Pyle Law. Since that time, most
21 of my cases have involved employment law, and many of them have involved wage and hour
22 matters.

23 7. I have been approved as Class Counsel in the following cases (among others),
24 which resolved favorably for the class members: *Jackson v. ACE* (Alameda County Superior Court
25 case no. RG05241698; settled for \$1.1 million); *Beasley, et al., v. Allied Cash Advance* (Alameda
26 County Superior Court case no. 07359698; settled for \$400,000); *Schakow v. Lerner New York,*
27 *Inc., et al.* (Contra Costa County case no. MSC08-01145; settled for \$850,000); *Brown, et al. v.*
28 *George S. May International Company* (Alameda County Superior Court case no. 08413991;

1 settled for \$750,000); *Miriam Aquino Ruelas, et al. v. Neilmed Products, Inc.* (Sonoma County
2 Case No. SCV245231; settled for approximately \$600,000); *Randolph et al. v. AT&T Wireless*
3 *Services, Inc., et al.* (Alameda County Superior Court case no. RG05193855); *Booker II, et al. v.*
4 *Auto Guardian, et al.* (Alameda Superior Court case No. RG11562117; settled for \$775,000);
5 *Alonzo, et al. v. First Transit, Inc.* (Los Angeles Superior Court case no. BC433932; settled for \$2
6 million); *Lopez, et al. v. City of Montebello* (Los Angeles Superior Court case no. BC553076;
7 settled for \$1 million); *Sadiq v. Greatwide Dedicated Transport II, LLC* (Alameda County
8 Superior Court case no. RG15789114; settled for \$762,500); *Kostyuk v. Golden State Overnight*
9 *Delivery Service, Inc.* (Alameda County Superior Court case no. RG14727191; settled for \$1.25
10 million); *Newcomb, et al. v. J.B. Hunt Transport, Inc.* (Alameda County Superior Court case no.
11 RG16815734; settled for \$750,000); *Hooper v. URS Midwest, Inc.,* (San Bernardino Superior
12 Court Case No. CIV DS1607489; settled for approximately \$3 million); *Brooks, et al. v. Chariot*
13 *Transit, Inc.* (San Francisco Superior Court case no. CGC-16-554398; settled for \$750,000);
14 *Austin, et al. v. Foodliner, Inc.* (United States District Court, Northern District of California case
15 no. 4:16-cv-07185-HSG; settled for \$1.2 million); *Castro, et al. v. ABM Industries, Inc., et al.*
16 (United States District Court, Northern District of California case no. 4:17-cv-03026-YGR; settled
17 for \$5,400,000); and *Botros v. Walgreen Co.* (United States District Court, Northern District of
18 California case no. 3:18-cv-05328-RS; settled for \$2,142,000).

19 8. Each of these cases, except for the *Randolph* case, was a wage and hour class
20 action. (*Randolph* was a consumer class action.)

21 9. I have prevailed in numerous contested motions for class certification including in
22 the cases of *Castro, et al. v. ABM Industries, Inc., et al.* (United States District Court, Northern
23 District of California case no. 4:17-cv-03026-YGR) and *Ortega et al. v. JBA Trucking* (Los
24 Angeles Superior Court case no. BC583827).

25 10. In 2006, 2007, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016 and 2017, I
26 organized and/or presented at annual CLEs put on by the Alameda County Bar Association Labor
27 and Employment Law Section regarding wage and hour law and class actions. The faculty for
28 these CLEs has included the Honorable George C. Hernandez, Jr., the Honorable Ronald Sabraw,

1 the Honorable Bonnie Sabraw, the Honorable Robert Freedman, the Honorable Steven Brick, the
2 Honorable David Flinn, the Honorable Richard A. Kramer, Jenna Whitman, Walter Stemmler and
3 Phillip Obbard.

4 11. I am a Lecturer at U.C. Berkeley Law School (formerly known as Boalt Hall).
5 From 2014 to 2016, I, along with one other Lecturer, taught the employment law course to second
6 and third year law students. The course materials included a survey of California wage and hour
7 law. From 2017 to present I have taught an advanced seminar on California Wage and Hour Law.

8 12. I am the primary contributor to www.workersrightsblog.com. That blog covers
9 recent developments in employment law, including wage and hour law. Additionally, I am a co-
10 author of “Civil Penalties Under the California Private Attorneys General Act (PAGA),”
11 Employment Damages and Remedies (CEB 2014). I have also served as the updating editor for
12 the Employee and Union Member Guide to Labor Law (West), Chapter 2 (“Opposing
13 Discriminatory Discharges”).

14 13. Almost every year from 2011 to present I have served on the faculty of the Stanford
15 Law School Trial Advocacy Workshop.

16 14. Almost every year from 2011 to present, I have been a panelist at annual seminars
17 put on by Bridgeport regarding California wage and hour law, including the Wage and Hour
18 Litigation Seminar.

19 15. I have made numerous other presentations regarding wage and hour law and class
20 actions. For example, each year from 2019 to present I have spoken on several panels regarding
21 California’s Private Attorneys General Act, including three panels in 2023. I have also spoken on
22 separate panels discussing trends in class action litigation.

23 16. I am a member of the California State Bar Labor and Employment Law Section. In
24 addition, I regularly serve as a volunteer attorney at the Workers’ Rights Clinic put on by the Legal
25 Aid Society of San Francisco Employment Law Center. I am also a member or past member of the
26 Alameda County Bar Association Labor and Employment Section and Trial Practice Section.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this Declaration was executed on March 16, 2023, in Oakland, California.

/s/ Hunter Pyle
Hunter Pyle