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SUPERIOR COURT OF CALIFORNIA
COUNTY OF CONTRA COSTA

JESSICA VASQUEZ, YANETH
RODRIGUEZ MELGAR, and KAHLIL
MARTIN, in a Representative capacity
only, and on behalf of other members of the
general public similarly situated,

Plaintiffs,

vs.

SALKHI FAMILY HOLDINGS, INC., a
California Corporation; SALKHI
PETROLEUM, INC., a California
Corporation; and DOES 1-10, inclusive,

Defendants.

Case No. MSC21-02223

Hon. Edward G. Weil
Dept. 12

**DECLARATION OF PLAINTIFF
KAHLIL MARTIN IN SUPPORT OF
MOTION FOR COURT APPROVAL OF
THE PARTIES' PAGA SETTLEMENT**

Date:

Time: 8:30 a.m.

Dept.: 12

Action Filed: November 3, 2021

Trial Date: None Set

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DECLARATION OF KAHLIL MARTIN

I, Kahlil Martin, declare as follows:

1. I am a Named Plaintiff and seek to represent the State of California and the Aggrieved Employees in the above captioned matter. I am over the age of eighteen. The following statements are based on my personal knowledge. If called upon to testify as to the matters stated herein, I could and would do so competently.

2. I submit this Declaration in Support of Plaintiffs' Motion for Court Approval of the Parties' PAGA Settlement.

3. I was employed as an hourly-paid, non-exempt employee by Defendants Salkhi Petroleum, Inc. and Salkhi Family Holdings, Inc. ("Defendants") from approximately May 2021 to approximately August 2021.

4. I experienced issues in my employment with Defendants, including Defendants' failure to (1) provide meal and rest breaks; (2) pay all minimum wages owed; (3) to pay overtime wages; (4) pay for all hours worked; (5) provide accurate, itemized wage statements; and (6) timely pay full wages earned during employment and upon termination or resignation.

5. Prior to filing the case, I had multiple telephonic conversations with my attorneys about my work experiences, possible claims, and my duties to serve as a Named Plaintiff and PAGA representative in this litigation, including, without limitations, participating actively in this lawsuit, reviewing significant events in this lawsuit, keeping abreast of the status and progress of the lawsuit and considering the interests of the State of California and Aggrieved Employees and putting those interest ahead of my own interests.

6. I knew that there was no guarantee that we would be successful in this case, and that there was a significant chance of protracted litigation. I understood I could potentially be liable for fees and costs. I realized that my name would be on a representative action, and that this information could be visible to others. I also understood that I may be required to spend a significant amount of time on the discovery process.

7. I worked with my attorneys to review facts and answer questions so they could draft the PAGA action complaint. I initiated this case on June 8, 2022. I have been working diligently on

1 this case for close to three years.

2 8. In advance of the private Mediation on August 15, 2023, I was available to answer
3 questions from and strategize with my attorneys. I remained on-call during the mediation and stayed
4 updated regarding its progress. While no settlement was reached at the mediation, I continued to be
5 informed of the ongoing settlement discussions.

6 9. After a settlement was reached, I reviewed the terms of the long-form settlement
7 agreement. I discussed the Settlement with my attorneys. Based on my own review and my attorneys'
8 evaluation and recommendation, I believe the settlement is fair and reasonable. I signed the Settlement
9 on December 27, 2024.

10 10. Throughout this action, I have been in constant communication with my attorneys to
11 keep apprised of the status of the litigation and answer questions as needed to pursue the case. I have
12 kept up to date on the status at every phase.

13 11. In sum, I worked with my attorneys to prepare the complaint, provided documents and
14 information regarding my experience working for Defendant, stayed up to date on the mediation
15 process and settlement decisions, and otherwise remained in constant contact with my attorneys. Over
16 the course of this litigation, I have contributed approximately 35 hours of my own time to the litigation
17 of these claims.

18 12. Aside from the payment I am eligible to receive as an Aggrieved Employee, and the
19 Service Award for serving as the employee representative, subject to court approval, I am not receiving
20 any other benefits from this Settlement.

21
22 I declare under penalty of perjury under the laws of the State of California that the foregoing
23 is true and correct and is based upon my personal knowledge.

24
25 Executed on 05 / 21 / 2025 in Fresno, California.

26
27 
28 _____
Kahlil Martin