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DARNELL LEE, LUIS ROBLES, XOCHITL VELASCO and
VICTOR GONZALEZ, individually and on behalf of all others similarly situated.

[Additional Counsel Listed On Next Page]

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

ANDREW D. TAPPIN, DONYEISHA MISH,
DARNELL LEE, LUIS ROBLES, XOCHITL
VELASCO, and VICTOR GONZALEZ,
individually and on behalf of all others similarly
situated, and on behalf of the general public as
private attorney general,

Plaintiff,

vs.

TFORCE FREIGHT, INC., a Virginia
Corporation; and DOES 1 through 50, inclusive,
Defendants.

Case No. 34-2022-00314820-CU-OE-GDS

Assigned for All Purposes to:
Hon. Jill Talley
Dept. 23

DECLARATION OF LUIS ROBLES

Date: June 21, 2024
Time: 9:00 a.m.
Dept. 23

Reservation No.: A-314820-003

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14 DARNELL LEE, LUIS ROBLES, and

XOCHITL VELASCO, and VICTOR GONZALEZ.

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1 I, LUIS ROBLES, declare as follows:

2 1. I am an adult over the age of eighteen (18) years old. I am the Named Plaintiff who
3 filed the above-captioned lawsuit. I have personal knowledge of the facts set forth in this
4 declaration. I make this declaration in support of Plaintiffs' Motion for Preliminary Approval of
5 Class Action Settlement.

6 2. I was employed by TForce as a non-exempt employee working as a Mechanic/Test
7 Driver in California at the Rialto, California location from approximately May 5, 2007 to August 4,
8 2019. While working for TForce, I don't think I was paid for all of my work time, including time
9 spent putting on work uniforms and undergoing security checks and time spent working after having
10 meal periods interrupted. TForce also deducted time if I clocked in and started working a few minutes
11 before the scheduled start of a shift. I also don't think I got all of my meal and rest breaks like I was
12 supposed to, and breaks were interrupted frequently by supervisors or because of issues with a
13 vehicle. I had to use my personal cell phone for work as well but never got any reimbursement.

14 3. I decided to bring this lawsuit because I did not feel that I was treated fairly as an
15 employee of Defendant, especially with regard to not being paid properly for all the hours I worked,
16 and not getting all of my proper lunches and rest breaks. As a result, I believe the other class members
17 and myself are owed additional compensation for all of the work we did that was not paid for by
18 TForce.

19 4. It is my understanding this lawsuit could not have been prosecuted or settled unless
20 I or some other employee decided to serve as a named plaintiff and pursue the case. In deciding to
26 serve as a named plaintiff, I understood that my name would be publicly attached to this lawsuit
22 and that my work experiences to some extent would be set forth in a public court file. I recognized
23 that I would need to devote a certain amount of time that I could have spent otherwise. I also
24 recognized that my bringing the lawsuit carried some degree of risk. Despite this, I decided to serve
25 as the named plaintiff without any promise of recovery or compensation.

26 5. I am familiar with the work involved in prosecuting this case. I have participated in
27 numerous meetings and communications with my lawyers regarding this case. I am familiar with
28 the allegations and defenses of the claims in this case. I am familiar with the major events in this

1 case, including the investigation performed by my lawyers, the mediation with Defendant that
2 resulted in this settlement, and the preparation of settlement papers and the need to obtain court
3 approval of the proposed settlement. I also was deposed for a full day and I participated in all
4 stages of the litigation and provided my lawyers with information and documents regarding my
5 employment with Defendant.

6 6. I believe that the proposed settlement obtained on behalf of the other aggrieved
7 employees is excellent in view of the issues and risks involved with the case.

8 7. I believe I have fulfilled my duties as a named plaintiff and class representative,
9 which required a significant amount of time and effort during the course of this case. These efforts
10 required dedicating numerous hours to lawsuit activities including, but not limited to:
11 (a) communicating with my attorneys to stay informed of ongoing developments in the case and to
12 discuss the proposed settlement ultimately negotiated; (b) searching for and providing documents
13 and other materials relating to my work experience; (c) responding to requests for information
14 relating to my work experience; and (d) reviewing filings and key documents including drafts of
15 the complaint and the settlement agreement. These tasks required my dedication of at least 20 or 25
16 hours of my time, which time I honestly could have spent on family, personal time, school time, or
17 work. My understanding is that future tasks may require several more hours of my time. I believe I
18 have been diligent and that I have acted above and beyond that of which is expected of a named
19 plaintiff to date and will continue to do so.

20 8. It is my opinion that \$10,000.00 is a fair and adequate award for my service as the
26 named plaintiff and class representative, and in consideration for my general release of all claims
22 against IPC. I believe that amount is fair and reasonable in view of the work I have and will
23 continue to perform on behalf of the State and the aggrieved employees. I believe that my role in
24 this lawsuit has resulted in a valuable benefit to the State of California and other aggrieved
25 employees, and I accepted the potential risk of being liable for the opposing parties' costs if we
26 were unsuccessful in this lawsuit. I believed in this case, so I was willing to be the named plaintiff
27 to risk this and pursue this class action litigation. I also accepted the risk that news of this lawsuit
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1 could also potentially impact my ability to secure other work. At all times I believe I have acted in
2 the best interests of the entire class.

3 9. Based on the time, service, risk, stress, potential stigma, loss of benefits and
4 excellent outcome of this case, I believe the enhancement for me is fair and reasonable.

5 I declare under penalty of perjury under the laws of the United States that the foregoing is
6 true and correct. Executed on 05 / 24 / 2024, at Fontana, California.

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LUIS ROBLES