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

ALEX HERNANDEZ, 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;
MARTIN SOHAL, individually, and on behalf
of other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiffs,

vs.

CHEP SERVICES, LLC, a Delaware limited
liability company; BRAMBLES USA, INC., an
unknown business entity; and DOES 1 through
100, inclusive,

Defendants.

Case No. CIVSB2123946

Honorable Jessica Morgan
Department S26

CLASS ACTION

**DECLARATION OF ALEX
HERNANDEZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declarations of Proposed Class
Counsel (Helene Mayer and Jeremy
Bollinger); Declaration or Proposed Class
Representative (Martin Sohal) and
[Proposed] Order filed concurrently
herewith]

Date: August 13, 2024
Time: 8:30 a.m.
Department: S26

Complaint Filed: August 16, 2021
Trial Date: None Set

DECLARATION OF ALEX HERNANDEZ

I, **Alex Hernandez**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff 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 CHEP Services, LLC and Brambles USA, Inc. (together, "Defendants") as an hourly-paid Machine Operator from January 2019 to approximately April 2020. I decided to seek legal advice about my work experiences with Defendants and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants paid me and other employees what was owed to us and were held accountable for their practice of not properly compensating their employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **6 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **10 hours** discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff, class representative, and eventually a PAGA representative.

3. I have spent over **20 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a named plaintiff, class representative, and PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, providing guidance regarding the duties of hourly-paid and 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.

4. As the case progressed, I was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **12 additional hours**

1 speaking with my attorneys about the case, identifying potential witnesses, providing my
2 attorneys with documents and information concerning the case, and also describing policies,
3 practices, and procedures of Defendants.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I spent about **3 hours** reviewing the settlement
6 agreement and about **3 hours** asking questions and discussing the potential settlement with my
7 attorneys before signing the settlement agreement.

8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
10 and the State of California. I think my efforts helped to get the result obtained in this case, and as
11 a class and PAGA representative, I respectfully request that the Court award me a service
12 payment in the amount of \$15,000.00 for my active participation in this case. Taking into
13 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

14 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

15 8. I have not entered into any undisclosed agreements, nor have I received any
16 undisclosed compensation in this case. The only compensation I will receive is whatever amount
17 the Court awards as a service payment, as well as my share of the settlement as a class member
18 and as an aggrieved employee.

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

21 Executed 04/04/2024 y of April 2024, at Apple Valley, California.

22 Eledvically Signed 2024-04-04 23:14:58 UTC 174.196.132.212
Alex Hernandez
23 James Asstresign@ 74adc226-47e24546-hai-b148017ec761

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