

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile
lwlee@diversitylaw.com
kagnew@diversitylaw.com

Attorneys for Plaintiffs Tamara Suvorova and Andy Echeverria Palomo

POTTER HANDY LLP
Mark D. Potter (SBN 166317)
mark@potterhandy.com
James M. Treglio (SBN 228077)
jimt@potterhandy.com
100 Pine St., Ste 1250
San Francisco, CA 94111
(858) 375-7385
Fax: (888) 422-5191

Attorneys for Plaintiff David Scott

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE**

DAVID SCOTT, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

HENDRICK CO AUTOMOTIVE, LLC, a
North Carolina limited liability company;
VKS MURRIETA LIMITED
PARTNERSHIP, a California limited
partnership; and DOES I to 100, inclusive,

Defendants.

Case No.: CIVRI2205368

(Assigned for all purposes to the Hon. Joseph T.
Ortiz, Dept. S17)

**DECLARATION OF DAVID SCOTT IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: May 16, 2024

Time: 1:30 P.M.

Dept.: S-17

Action Filed: February 17, 2022

Trial Date: None Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

I, David Scott, declare as follows:

1. I am an individual over the age of 18. I am the named plaintiff in the above-

2. I was employed by Defendants Hendrick Co Automotive, LLC and VKS Murrieta

3. During my employment, I regularly worked shifts of five hours or more without

4. In addition, during my employment I was required to use my personal cell phone

5. I understand that this action was brought on behalf of all other employees in the

6. I have and continue to be willing to assist in the investigation of this matter,

7. I have reviewed the Joint Stipulation of Class Action Settlement and Release of Claims (“Settlement Agreement”) and discussed its terms with my attorneys, and based on the information provided, I believe the settlement to be fair, adequate, and reasonable for myself and for the entire Class.

8. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive accomplishment and understand that other people will benefit because of the actions that I have taken. I believe that the settlement is fair, adequate, and reasonable.

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

Executed on this 04/23/2024 day of April 2024, at San Antonio, TX, California.

David Scott

28D6B951AF8F1EC7FBEC39D4F9CA3856

David Scott