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

VINCENT RAMSEY JR., individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

PACKAGING CORPORATION OF AMERICA,
et al.,

Defendants.

VINCENT RAMSEY JR., individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

PACKAGING CORPORATION OF AMERICA,
et al.,

Defendants.

Case No. 34-2021-00313350-CU-OE-GDS
[Consolidated with 34-2022-00316273-CU-OE-
GDS]

**DECLARATION OF VINCENT RAMSEY
JR. IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: November 17, 2023

Time: 9:00 a.m.

Dept.: 28

Complaint Filed: December 29, 2021

FAC Filed: July 1, 2022

Trial Date: None

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I, Vincent Ramsey Jr., declare as follows:

1. I am an individual over the age of 18 years old and am a resident of California. I am the named Plaintiff in this matter. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I worked for Defendants Packaging Corporation of America and PCA Central California Corrugated, LLC (together, “Defendants”) as an Assistant Operator since about May 18, 2018. I was hired as a non-exempt, hourly employee and worked for Defendants in Sacramento County.

3. During my employment with Defendants, the wage statements issued to me were inaccurate whenever overtime and/or shift differential wages were paid.

4. During the pendency of this lawsuit, I was required to provide assistance to my attorneys, including meeting with them and providing them with documents and information. I have continuously been kept apprised of the status of this case. Specifically, I have discussed the allegations in the lawsuit, relevant documents, and policies with my attorneys. I have also reviewed and approved the settlement documents and other pleadings in this case.

5. I estimate I have spent between 20-25 hours assisting my attorneys litigate this case. I reviewed documents that I had related to my employment to be able to provide this information and looked back at my schedules to determine relevant information. I also reviewed documents related to the lawsuit and the filing with the Labor and Workforce Development Agency. I discussed these with my lawyers. I understand that these actions were important to achieving the result achieved in this case. I also reviewed the Settlement Agreement and supporting documents.

6. I understand that the class claims alleged in this action were brought on behalf of other similarly situated employees, and thus I am acting as a representative for the Class. As the class representative, I understand that it is my responsibility to act in the Class's best interest and not my own. I agree that I will not put my own interests ahead of that of the Class. Moreover, I am not aware of any conflicts that exist between my interest and the interests of the Class that

would impair or affect my ability to serve as representative for the Class.

7. I have and continue to be willing to assist in the investigation of this matter as well as make myself available for trial or any further proceeding in this matter as required to represent the interests of the Class. I also understand my duties and responsibilities to the proposed class and will carry out those duties as necessary.

8. Based on my understanding of the case, I am of the opinion that settlement for the consideration and on the terms set forth in the Stipulation re: Settlement of Class and PAGA Action (“Settlement Agreement”) are fair, reasonable, and adequate and is in the best interests of the Class.

9. I understand that I could have been liable for Defendants’ legal costs had Defendants prevailed. I also understand that this lawsuit was filed in the public court records.

10. I also agreed to provide a general release of claims and waived the protections of Civil Code § 1542. I understand that this was a more expansive release of claims than given by the class members.

11. I am proud of the result achieved in this case and understand that the settlement will benefit other employees of the companies who suffered similar violations of the Labor Code.

12. When I hired my attorneys, I signed a written retainer agreement. The retainer agreement explained that the legal fees associated with this case would be split between Diversity Law Group and Webber Law Group. Diversity Law Group will receive two-thirds (2/3) and Webber Law Group will receive one-third (1/3). I approve the fee splitting agreement between my attorneys.

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1 13. I do not have any affiliation or conflict of interest with the designated cy pres
2 beneficiary, Center for Employment Opportunities.

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

5 Executed on this 24 day of October __, 2023, at Carmichael, California.

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8 ID pWMrcsRx1BA676vETrDVBA1k

9 _____
10 Vincent Ramsey Jr.