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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA**

JOSE VALENCIA, an individual,
BRANDON JEROUE, an individual, and on
behalf of all others similarly situated,

Plaintiffs,

vs.

SENTINEL TRANSPORTION, LLC, a
Delaware limited liability company; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 22CV00951

[Assigned for all purposes to the Hon. James F.
Rigali, Department SM Dept. 2]

**DECLARATION OF JOSE VALENCIA IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS AND
REPRESENTATIVE ACTION SETTLEMENT**

Date: June 25, 2024

Time: 8:30 a.m.

Dept.: SM Dept. 2

Action Filed: April 29, 2022

Trial Date: None Set

1 I, Jose Valencia, hereby declare and state as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the facts set
3 forth below and if called to testify I could and would do so competently.

4 2. I am one of the named plaintiffs in this action and submit this declaration in
5 support of Plaintiffs' Motion for Final Approval of Class and Representative Action Settlement.
6 Because I believe I have provided invaluable assistance during the course of this case, I am
7 hopeful that the Court will approve our request of a \$10,000 Enhancement Payment for myself
8 and the other Class Representative.

9 3. I previously worked for Sentinel Transportation, LLC (the "Company") as a truck
10 driver.

11 4. I filed this lawsuit because I was concerned that I was not being paid properly for
12 all the hours that I worked, and was not being reimbursed for work related expenditures,
13 including the maintenance of the gear/clothing I wore at work. By bringing a class action
14 lawsuit, I hoped that I might be able to change the Company's policies to better protect the
15 working conditions of my co-workers.

16 5. However, I did not make the decision to file a class action lightly. I was
17 concerned by the attention that a class action lawsuit would attract in the workplace and the
18 reputational harm that may result, including the perception that I am difficult to work with. I
19 was also mindful that filing a class action lawsuit could jeopardize my employment status.
20 Although the lawsuit is justified, my current or prospective employer might find out that I sued
21 the Company, and there is a risk of facing retaliation and strained relationships with colleagues
22 and supervisors. Nevertheless, I felt that important rights were at stake that hurt everyone, and
23 something ought to be done about it.

24 6. I made it a priority to be actively involved because I wanted to do everything I
25 could to assist my attorneys in prosecuting this case. I also understood it was my duty as a Class
26 Representative to represent the best interests of the class, know about the lawsuit, help my
27 attorneys, and keep updated on the case.

28 7. I have invested a lot of personal time and energy while this lawsuit has been

1 pending. I met with members from Polaris Law Group and Diversity Law Group, and spent a lot
2 of time on the phone with my attorneys to get updates about the case and provide them with
3 information. Since I first got involved in this case, I have had approximately twenty phone calls
4 with my attorneys. Some of these phone calls lasted about thirty-five minutes.

5 8. Throughout the case, I spent time looking for documents relevant to the case,
6 including wage statements, employee handbooks, and text messages. Additionally, I provided
7 my attorneys valuable information, such as the Company's policies and procedures pertaining to
8 the payment of wages for cancelled shifts, and the estimated costs incurred by employees in
9 maintaining their work gear. I also reviewed case documents, such as the PAGA Notice and
10 Complaint.

11 9. Before signing the Joint Stipulation of Class and Representative Action
12 Settlement ("Settlement Agreement" or "Agreement"), I read the Settlement Agreement, I
13 discussed the terms of the settlement with my attorneys. I believe that this settlement is fair,
14 adequate, and reasonable. I am glad that I had the opportunity to represent the class in this
15 lawsuit and that I was able to recover money through a settlement for the class.

16 10. Over the course of the lawsuit, I estimate that I invested approximately sixteen
17 hours in this case, including time spent: (1) participating in numerous telephonic meetings with my
18 attorneys and their staff to discuss the case and review documents prepared on my behalf; (2)
19 providing my attorneys with information and documents relevant to the reimbursement and off-the-
20 clock claims; (3) making myself available by telephone during the mediation; (4) reviewing and
21 executing the Settlement Agreement; and (6) reviewing and signing the declarations submitted to this
22 Court in support of the settlement.

23 11. I understand that the Settlement Agreement provides an Enhancement Payment in
24 the amount of \$10,000 to me and the other Class Representative. I believe this amount is fair
25 compensation for my time and effort on this case, for helping to prosecute this case, and the risks
26 with respect to my future employment. In addition, the settlement requires that I enter into a
27 general release, which I understand is broader than the release that will bind other class
28 members. I am receiving no compensation in addition to that provided for in the settlement.

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

Bakersfield

Jose Valencia