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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 BRANDON JEROUE 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, Brandon Jeroue, 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. From approximately March 27, 2020, until on or about November 28, 2021, I
10 worked as a truck driver for Sentinel Transportation, LLC ("Defendant" or the "Company").

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

16 5. I made it a priority to be actively involved because I wanted to do everything I
17 can to assist my attorneys in prosecuting this case. I also understood it was my duty as a Class
18 Representative to represent the best interests of the class, know about the lawsuit, help my
19 attorneys, and keep updated on the case.

20 6. I have invested a lot of personal time and energy while this lawsuit has been
21 pending. I met with members from Polaris Law Group and Diversity Law Group, and spent a lot
22 of time on the phone with my attorneys to get updates about the case and provide them with
23 information. Since I first got involved in this case, I have had approximately thirteen phone calls
24 with my attorneys. Some of these phone calls lasted about thirty minutes.

25 7. Throughout the case, I spent time looking for documents relevant to the case,
26 including wage statements, employee handbooks, and text messages. Additionally, I provided
27 my attorneys valuable information, such as the Company's policies and procedures pertaining to
28 the payment of wages for cancelled shifts, and the estimated costs incurred by employees in

1 maintaining their work gear. I also reviewed case documents, such as the PAGA Notice and
2 Complaint.

3 8. Before signing the Joint Stipulation of Class and Representative Action
4 Settlement (“Settlement Agreement” or “Agreement”), I read the Settlement Agreement, I
5 discussed the terms of the settlement with my attorneys. I believe that this settlement is fair,
6 adequate, and reasonable. I am glad that I had the opportunity to represent the class in this
7 lawsuit and that I was able to recover money through a settlement for the class.

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

15 10. I did not make the decision to file a class action lightly. I was concerned by the
16 attention a publicly filed lawsuit, and especially a class action, would attract. My name would be
17 associated with a lawsuit that I filed against my former employer. I am mindful that prospective
18 employers might find out that I sued the Company, and this could hurt my employability.
19 Nevertheless, I felt that important rights were at stake that hurt everyone, and something ought to
20 be done about it.

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

27 12. I respectfully request that the Court award me a \$10,000 Enhancement Payment.
28 Based on my involvement in this case and the benefits provided to my former co-workers, I can

1 say I helped stand up for the other workers who were too afraid to say anything to management
2 because they did not want to risk losing their jobs or risk the stigma of suing an employer. I was
3 not afraid to take that risk because I strongly care about helping out my former co-workers.

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

6 Executed on May 30, 2024, at Santa Maria, California.

7 DocuSigned by:
8 Brandon Jeroue
9 ~~Brandon Jeroue~~