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

ROBERT JORDAN, as an individual and on
 behalf of all others similarly situated,

Plaintiff,

vs.

MONDELEZ GLOBAL LLC, a Delaware
 limited liability company; and DOES 1
 through 50, inclusive,

Defendants.

Case No.: CIVSB2202758

**DECLARATION OF ROBERT JORDAN IN
 SUPPORT OF PLAINTIFF'S MOTION FOR
 FINAL APPROVAL OF CLASS ACTION
 SETTLEMENT**

Date: February 20, 2024

Time: 8:30 a.m.

Dept.: S26

Complaint Filed: February 4, 2022

Trial Date: None Set

DECLARATION OF ROBERT JORDAN

I, Robert Jordan, 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. During the approximate period of 2018, through approximately August 11, 2021, I worked as a driver for Mondelez Global LLC ("Defendant" or the "Company"). For the duration of my employment, I was an hourly, non-exempt employee.

3. I filed this lawsuit because I was concerned that I was not paid properly for all the hours that I worked, and I was not provided all of my meal and rest breaks. I understood that an individual case would have resolved much faster than a class action and involved much less financial risk than a class action. However, by bringing a class and representative PAGA action, I hoped that I might be able to change the Company's policies to better protect the working conditions of my former co-workers.

4. I understand that the claims alleged in this action were brought on behalf of other similarly situated employees, and that 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 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.

5. I have continuously been kept apprised of the status of this case and invested a lot of personal time and energy into representing the interests of the Class. Throughout the case, I spent a significant amount of time looking for documents relevant to the case, including wage statements, employee handbooks and emails. Additionally, I met with my attorneys on multiple occasions to provide documents and information regarding the Company's personnel and payroll practices and discuss the status of the case. I also met with my attorneys to review and provide input on case documents, such as the PAGA Notice, Complaint and First Amended Complaint. I made a concerted effort to be continuously apprised of the status of this case.

6. Before signing the Joint Stipulation² of Class Action Settlement ("Settlement

1 Agreement” or “Agreement”), I discussed in detail the terms of the Agreement with my attorneys. I
2 believe that the terms of the Settlement are fair, adequate and reasonable.

3 7. I did not make the decision to join this class action lightly. I was concerned by the
4 attention a publicly filed lawsuit, and especially a class action, would attract. My name would be
5 associated with a lawsuit that I filed against my former employer. Additionally, because the claims
6 alleged by me involved the payment of costs to the prevailing party, I could have possibly faced
7 paying the fees and costs of Defendants, had I not prevailed in this action. I also understood that an
8 individual case would have resolved much faster than a class action and involved much less financial
9 risk than a class action.

10 8. I respectfully request that the Court award a \$10,000 incentive award to me. I believe
11 this amount is fair compensation for my time and effort on this case, for helping to prosecute this
12 case, and the risks with respect to my future employment. In addition, the Settlement requires that I
13 enter into a general release, which I understand is broader than the release that will bind other Class
14 Members.

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

17 Executed on January 19, 2024, at Perris, California.

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20 DocuSigned By: Robert Jordan
21 Robert Jordan
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