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

JOSHUA D. HODGES, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

CALIFORNIA TRUCK CENTERS, LLC, a
California Limited Liability Company;
DELTA TRUCK CENTER, a California
Company; and DOES 1-50, inclusive,

Defendants.

CASE NO. STK-CV-UOE-2022-0000168

*[Case assigned for all purposes to the Hon.
George J. Abdallah, Dept. 10A]*

**DECLARATION OF ANDREW J.
ROWBOTHAM IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT,
ATTORNEYS' FEES AND COSTS, AND
CLASS REPRESENTATIVE
ENHANCEMENT AWARDS**

Date: October 13, 2025
Time: 9:00 a.m.
Dept.: 10A

Action Filed: January 10, 2022
Trial Date: None Set

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I, Andrew J. Rowbotham, declare as follows:

1. I am a Partner at the Haines Law Group, APC, and counsel for named Plaintiffs Joshua D. Hodges and Daniel Vogel (“Plaintiffs”) in the above-captioned matter. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I am a 2014 graduate of Pepperdine University School of Law and was admitted to the California State Bar in December 2014. Since that time, I have practiced exclusively in the area of plaintiff's employment litigation. From October 2014 to May 2015, I worked as an associate at the Mesriani Law Group, an employment law firm in Santa Monica, California. The vast majority of my work focused on representing employees in wage and hour and wrongful termination actions. Although non-exhaustive, the type of work I performed included: conducting client intakes; performing pre-filing research and analysis; drafting complaints and letters to the Labor & Workforce Development Agency; attending court hearings; corresponding with opposing counsel; drafting and responding to written discovery; analyzing payroll and timekeeping records and employee handbooks; drafting complaints and mediation briefs; attending mediations; and drafting long-form settlement agreements.

3. Since April 2016, I have worked at my current firm, Haines Law Group, APC. I am currently involved with approximately fifty (50) active wage and hour class actions, including a number of “hybrid” actions asserting nationwide wage and hour claims under the Fair Labor Standards Act, as well as California-specific claims under Rule 23 of the Federal Rules of Civil Procedure.

4. The following is a non-exhaustive list of wage and hour class actions (which have been granted final approval) in which I have been named as Class Counsel:

- *Rodriguez v. Spartan, Inc.*, Case No. BCV-15-100007-DRL, California Superior Court, County of Kern, Honorable David R. Lampe, presiding;

- *Tapper v. Squad Security CA, Inc.*, Case No. BC607241, California Superior Court, County of Los Angeles, Honorable John Shepard Wiley Jr., presiding;
- *Nieves v. Ta Chen International, Inc.*, Case No. BC609005, California Superior Court, County of Los Angeles, Honorable Kenneth R. Freeman, presiding;
- *Mansilla v. Haeco Americas Line Services, LLC*, Case No. BC615310, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle, presiding;
- *Rodriguez v. Mersen USA Oxnard-CA Inc.*, Case No. 56-2015-00471031-CU-OE-VTA, California Superior Court County of Ventura, Honorable Kent M. Kellegrew, presiding;
- *Khosravi v. Enterprise Rent-A-Car Company of Los Angeles, LLC*, Case No. 30-2016-00829923-CU-OE-CXC, Superior Court of California, County of Orange, Honorable Thierry Patrick Colaw presiding;
- *De Loera v. Pharmaceutic Litho & Label Company, Inc.*, Case No. 56-2016-00479931-CU-OE-VTA, Superior Court of California, County of Ventura, Honorable Kent M. Kellegrew presiding;
- *Ortiz v. Endologix, Inc.* Case No. 30-2016-00873893-CU-OE-CXC, Superior Court of California, County of Orange, Honorable William D. Claster presiding;
- *Delgado v. Pacific Coast Cabling, Inc.*, Case No. BC600419, Superior Court of California, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
- *Valsabel v. Vintage Tile & Stone, Inc.*, Case No. 30-2016-00848602-CU-OE-CXC, Superior Court of California, County of Orange, Honorable Randall J. Sherman presiding;
- *Ramos v. Da/Pro Rubber, Inc.*, Case No. BC621297, Superior Court of California, County of Los Angeles, Honorable William F. Highberger presiding;
- *Lopez v. Bornt & Sons, Inc.*, Case No. ECU09820, Superior Court of California, County of Imperial, Honorable Jeffrey B. Jones presiding;

- *Ruvalcaba Quiroz v. Circle M Contractors, Inc.*, Case No. 30-2016-00885065-CU-OE-CXC, Superior Court of California, County of Orange, Honorable William D. Claster presiding;
- *Armenta, et al., v. California Friends Homes d/b/a Quaker Gardens*, Case No. 30-2016-00883282-CU-OE-CXC, Superior Court of California, County of Orange, Honorable Randall J. Sherman presiding;
- *Ayala, et al., v. Dearden's*, Case No. BC679750, Superior Court of California, County of Los Angeles, Honorable Elihu M. Berle presiding;
- *Becerra v. All Valley Washer Service, Inc.*, Case No. BC663448, Superior Court of California, County of Los Angeles, Honorable Amy D. Hogue presiding;
- *Song, et al. v. Blendtec, Inc.*, Case No. STK-CV-VOE-2016-6272, Superior Court of California, County of San Joaquin, Honorable Roger Ross presiding;
- *Zinnerman v. Tumbleweed Educational Enterprises, Inc.*, Case No. BC673708, Superior Court of California, County of Los Angeles, Honorable Maren E. Nelson presiding;
- *Chairez v. B.E. McCarty, Inc.*, Case No. 56-2017-00503353-CU-OE-VTA, Superior Court of California, County of Ventura, Honorable Vincent O'Neill presiding;
- *Garcia, et al. v. Simplified Labor Staffing Solutions, Inc.*, Case No. BC696898, Los Angeles County Superior Court, Honorable Elihu M. Berle, presiding (approving an hourly rate of \$400 for work performed in 2018 and 2019);
- *Delgado v. Spears Manufacturing Co.*, Case No. BC709665, Los Angeles County Superior Court, Honorable Maren E. Nelson, presiding (approving an hourly rate of \$425 for work performed in 2018, 2019, and 2020);
- *Soto v. L I Metal Systems*, Case No. 37-2017-00009607-CU-OE-CTL, San Diego County Superior Court, Honorable Timothy Taylor, presiding (approving an hourly rate of \$425 for work performed from 2017-2020);

- *Fishback v. Paragon Framing, Inc.*, Case No. CIVDS1906610, San Bernardino County Superior Court, Honorable David Cohn, presiding (approving an hourly rate of \$425 for work performed in 2019 and 2020);
- *Fishback v. J.D. Miller Construction Inc.*, Case No. CIVDS1906611, San Bernardino County Superior Court, Honorable David Cohn, presiding (approving an hourly rate of \$425 for work performed from 2019-2021);
- *Teeba v. Brill, Inc.*, Case No. CIVDS1923242, San Bernardino County Superior Court, Honorable David Cohn, presiding (approving an hourly rate of \$425 for work performed from 2019-2021);
- *Gonzalez v. Precision Hospitality & Development, LLC*, Case No. 30-2020-01127597-CU-OE-CXC, Orange County Superior Court, Honorable Randall J. Sherman, presiding (approving an hourly rate of \$450 for work performed in 2020 and 2021);
- *Vides v. Celoseal Roofing, Inc.*, Case No. 30-2020-01162478-CU-OE-CXC, Orange County Superior Court, Honorable Randall J. Sherman, presiding (approving an hourly rate of \$475 for work performed from 2020-2022);
- *Qawas v. Socal Framing, Inc.*, Case No. RIC1902588, Riverside County Superior Court, Honorable Sunshine S. Sykes, presiding (approving an hourly rate of \$475 for work performed from 2019-2022);
- *Nelson v. Santini Foods, Inc.*, Case No. RG21090890, Alameda County Superior Court, Honorable Evelio Grillo, presiding (approving an hourly rate of \$475 for work performed in 2021 and 2022);
- *Zuniga v. Sonar Inc.*, Case No. 30-2019-01117310-CU-OE-CXC, Orange County Superior Court, Honorable Peter Wilson, presiding (approving an hourly rate of \$575 for work performed from 2019-2023); and
- *Gonzalez v. Guardian Industries LLC*, Case No. 19CECG02134, Fresno County Superior Court, Honorable Jonathan M. Skiles, presiding (approving an hourly rate of \$575 for work performed from 2019-2023).

1 • *Sanchez v. Dutton Home Services, LLC*, Case No. 22STCV01834, Los Angeles
2 County Superior Court, Honorable Maren E. Nelson, presiding (approving an hourly
3 rate of \$575 for work performed from 2022-2023).

4 • *Ramirez v. Wyndham Vacation Ownership, Inc.*, Case No. 20CV01715, Santa Barbara
5 County Superior Court, Honorable James F. Rigali, presiding (approving an hourly
6 rate of \$650 for work performed from 2020-2024).

7 5. I have also been named as Class Counsel for the certified class following a
8 contested class certification motion in the following case:

9 • *Staublein v. Wells Fargo Bank, National Association*, Case No. CIVDS1712267, San
10 Bernardino Superior Court, Honorable David Cohn presiding (certifying a wage
11 statement class).

12 6. In March 2023, I served as trial counsel for the plaintiff and the aggrieved
13 employees in the matter of *Abraham Taduran v. James R. Glidewell, Dental Ceramics, Inc. dba*
14 *Glidewell Laboratories*, Case No. 30-2017-00934037-CU-OE-CXC, Orange County Superior
15 Court, Honorable William Claster presiding, which was a case brought under the Private
16 Attorneys General Act, Labor Code §§ 2698 *et seq.*, that resulted in a six-figure verdict in favor
17 of the aggrieved employees.

18 7. In addition to the above cases, I also play a significant role in many of my firm's
19 current wage and hour class actions. The scope of my involvement includes but is not limited to:
20 corresponding with opposing counsel; attending court hearings; drafting and responding to
21 written discovery; preparing for and defending depositions; negotiating and drafting long-form
22 settlement agreements; attending mediations; and drafting motions for preliminary and final
23 approval.

24 8. Between 2020 and 2025, Thomson Reuters recognized me as a Top Young
25 Attorney in Southern California in the annual Rising Stars Edition of Super Lawyer. This is an
26 honor awarded to no more than two-and-a-half percent of attorneys under the age of forty in
27 Southern California each year.

1 9. As counsel for Plaintiffs, I have been actively involved in all aspects of this
2 litigation since its inception. I played an integral part in the negotiation and resolution of the
3 claims at issue in this lawsuit.

4 10. Defendants are commercial dealers of new and used medium and heavy-duty
5 trucks with multiple locations across California. Plaintiff Joshua D. Hodges worked for
6 Defendants as a non-exempt employee from January 22, 2018 to approximately September 2021.
7 Plaintiff Daniel Vogel worked for Defendants as a non-exempt employee beginning on
8 approximately November 27, 2015. Like all Settlement Class Members, Plaintiffs were subject
9 to Defendants' allegedly unlawful wage-and-hour policies and practices.

10 11. On January 10, 2022, Plaintiff Hodges filed this class action lawsuit alleging that
11 Defendants failed to pay all overtime wages, provide all lawful meal periods, authorize and permit
12 all lawful rest periods, reimburse necessary business expenses, issue accurate itemized wage
13 statements, timely pay all final wages, and that they violated California's Unfair Competition
14 Law. Plaintiff amended the complaint on February 2, 2022 to add causes of action for failure to
15 pay all minimum wages and unlawful deductions, and on June 9, 2022 to add a cause of action
16 for civil penalties under PAGA.

17 12. On February 14, 2023, Plaintiff Vogel filed a related class action in Alameda
18 County Superior Court titled *Daniel Vogel v. Golden Gate Freightliner, Inc.*, Case No.
19 23CV027835 ("Vogel Action"), asserting substantially similar claims based on the same alleged
20 violations. In addition to the claims asserted by Plaintiff Hodges, Plaintiff Vogel alleged that
21 Defendants failed to timely pay employees at least twice per month and failed to provide a safe,
22 healthy work environment.

23 13. On January 16, 2025, Plaintiffs filed the operative Third Amended Class and
24 Representative Action Complaint, naming Vogel as an additional plaintiff and incorporating all
25 claims and factual allegations from the Vogel Action. On April 2, 2025, Plaintiff Vogel submitted
26 a request for dismissal of the Vogel Action without prejudice.

27 14. The Parties engaged in significant written and deposition discovery before
28 resolution. Through formal discovery, Defendants produced timekeeping and payroll records for

1 all Settlement Class Members for the entire Class Period, along with policy documents and
2 employee handbooks in effect during the relevant period. The Parties also completed a *Belaire-*
3 *West* privacy mailing, and Plaintiffs took the deposition of Defendants' Person Most Qualified
4 witness. Plaintiffs retained an expert with a Ph.D. in economics to analyze Defendants' data and
5 prepare a classwide damages model.

6 15. The Parties participated in an initial mediation session with Francis Ortman, Esq.,
7 an experienced wage-and-hour mediator, on May 22, 2023. During the mediation, the Parties
8 exchanged divergent views regarding Defendants' liability, potential exposure, legal defenses,
9 and the likelihood of class certification, but they were unable to resolve the case.

10 16. Following the initial mediation, Defendants initiated a "Pick-Up-Stix" campaign,
11 offering individual settlement payments to employees in exchange for a release of claims.
12 Defendants represent that approximately 41% of the Settlement Class Members signed releases
13 and accepted settlement payments totaling \$415,904.98, resulting in an average payment of about
14 \$715 per person. Although these individuals signed releases, they remain part of the Settlement
15 Class and will receive payments under the terms of the Settlement. In addition, Settlement Class
16 Members who did not sign releases will receive an equivalent additional payment under the
17 Settlement to account for the consideration already provided to those who signed early releases.

18 17. The Parties subsequently participated in a second mediation session with Mr.
19 Ortman on September 20, 2024. At the conclusion of the second mediation, Mr. Ortman issued a
20 mediator's proposal, which the Parties accepted. Over the following months, the Parties worked
21 cooperatively to finalize the terms of the Settlement, which this Court granted preliminary
22 approval on May 19, 2025. A true and correct copy of this Court's Order Granting Preliminary
23 Approval is attached hereto as **Exhibit 1**.

24 18. On April 11, 2025 and May 14, 2025, Plaintiffs submitted the Settlement
25 Agreement to the LWDA in connection with the filing of the Motion for Preliminary Approval.
26 True and correct copies of the LWDA submission confirmations for this matter are attached hereto
27 as **Exhibit 2**.

1 19. Defendants will pay a non-reversionary Maximum Settlement Amount
2 (“MSA”) of \$3,665,904.98. The Net Settlement Amount (“NSA”) is the remainder of the MSA
3 after deducting Court-approved amounts for attorneys’ fees (\$1,221,968.33), litigation costs
4 (\$96,938.26), Class Representative Enhancement Awards (\$20,000.00), settlement
5 administration costs (\$12,950.00), the previously paid \$415,904.98 Pick-Up-Stix amount, and the
6 LWDA’s 75% share of PAGA penalties (\$75,000.00). Based on these requested amounts, the
7 NSA is approximately \$1,823,143.41.

8 20. Class Counsel’s cost records identify combined total out-of-pocket expenses
9 incurred to date as \$96,550.52. The total amount Class Counsel now seeks for reimbursement,
10 \$96,938.26, includes an additional \$387.74 in anticipated future costs to my firm, Haines Law
11 Group, APC, which are expected to be incurred in connection with the filing and service of the
12 Motion for Final Approval and the Settlement Administrator’s final accounting declaration.

13 21. As detailed in Plaintiffs’ Motion for Preliminary Approval, Defendants deny that
14 any employees were underpaid and assert that their rounding practices were facially neutral and
15 lawful. Defendants further contend that bonuses and other compensation paid to employees were
16 discretionary and therefore properly excluded from the regular rate of pay. Defendants also argue
17 that individualized inquiries would be required to determine whether any employee was
18 underpaid, defeating class certification.

19 22. Defendants assert that they maintained legally compliant policies and practices
20 providing all required meal periods. They contend that any missed or late meal periods were the
21 result of employee choice rather than any company policy or practice. Defendants further argue
22 that individualized inquiries would be necessary to determine whether a meal period was missed,
23 shortened, or waived, and whether a premium was paid, precluding class certification.

24 23. Defendants assert that employees were authorized and permitted to take compliant
25 10-minute rest periods and that employees in fact took them. They argue there is no common
26 evidence of rest period violations because rest periods were not recorded in Defendants’
27 timekeeping system. Defendants contend that employees were provided more than 10 minutes for
28 rest breaks and were not required to return to their workstations within 10 minutes. Finally,

1 Defendants argue that individualized inquiries would be necessary to determine whether any
2 employee missed or received a deficient rest period, precluding class certification.

3 24. Defendants assert that they reimbursed employees for all necessary business
4 expenses. They contend that employees were not required to use personal cell phones for business
5 purposes and that, to the extent any employee incurred business-related expenses, Defendants
6 were not notified and thus were not obligated to reimburse them.

7 25. Defendants argue that Plaintiffs' derivative claims fail because the underlying
8 claims lack merit. They assert that Plaintiffs cannot show "knowing and intentional" wage
9 statement violations or "willful" failures to pay final wages, as required for penalties under Labor
10 Code §§ 203 and 226(e). Defendants further contend that any PAGA penalties awarded should
11 be substantially reduced in the Court's discretion.

12 26. Class Counsel's fee request of \$1,221,968.33, representing one-third of the MSA,
13 is the same percentage approved in *Laffitte* and is fair and reasonable under the percentage-of-
14 recovery method. This is consistent with Class Counsel's experience in similar wage-and-hour
15 class actions. Since undertaking representation of Plaintiffs, Class Counsel has devoted
16 substantial time and resources on a pure contingency basis, without any guarantee of
17 compensation. Their efforts included conducting a pre-filing investigation, analyzing Plaintiffs'
18 claims, conducting legal research, engaging in substantial formal and informal discovery,
19 reviewing classwide documents and data including timekeeping and payroll records to construct
20 a damages model, preparing for and attending two mediation sessions, negotiating and drafting
21 the Memorandum of Understanding, the Settlement Agreement, and the Notice Packet, preparing
22 the Motions for Preliminary and Final Approval, overseeing the notice process, responding to
23 Settlement Class Member inquiries, and otherwise litigating the case.

24 27. Class Counsel incurred and respectfully requests reimbursement of \$96,938.26 in
25 actual litigation costs, which is less than the \$100,000.00 in costs preliminarily approved by the
26 Court. The unclaimed portion of the cost allocation will be added to the Net Settlement Amount
27 and distributed to participating Settlement Class Members. A true and correct copy of my firm's
28 cost records is attached hereto as **Exhibit 3**.

1 28. My firm retained Dr. J. Michael DuMond, Ph.D., of Berkeley Research Group, to
2 perform expert analyses in this case. Copies of Dr. DuMond’s expert invoices are attached hereto
3 as **Exhibit 4**.

4 29. Plaintiffs request approval of \$12,950.00 in administration costs to ILYM Group,
5 Inc. (“ILYM”), the Court-approved Settlement Administrator. As detailed in the declaration of
6 Nathalie Hernandez submitted with this Motion, ILYM performed tasks essential to implementing
7 the Settlement and carrying out the Notice process. ILYM calculated each Settlement Class
8 Member’s Individual Settlement Payment, updated addresses using data provided by Defendants,
9 and formatted and mailed Notice Packets to all 1,480 potential Settlement Class Members.

10 30. Plaintiffs seek Class Representative Enhancement Awards of \$20,000.00 total
11 (\$10,000.00 each). This request is reasonable given Plaintiffs’ efforts in this case, the risks
12 undertaken on behalf of the Settlement Class Members, and their general release of all claims
13 against Defendants, including a waiver of rights under California Civil Code § 1542. Plaintiffs’
14 requested Enhancement Awards recognize the significant time and effort they expended on behalf
15 of the Settlement Class during this litigation. Among other things, Plaintiffs searched for relevant
16 documents, provided factual information to counsel, participated in numerous calls to discuss the
17 claims and Defendants’ policies and practices, assisted in preparing for mediation, made
18 themselves available during mediation to respond to factual questions, reviewed and provided
19 input regarding the settlement terms, and otherwise assisted counsel in advancing the case toward
20 resolution. Plaintiffs invested considerable time and effort in pursuing this case, and the
21 Settlement Class, who would not be receiving any recovery but for Plaintiffs’ decision to move
22 forward with these claims, directly benefits from their participation. Plaintiffs not only attached
23 their names to the lawsuit for the benefit of the class but also agreed to a broader release than that
24 required of other Settlement Class Members, including a waiver of Civil Code § 1542. Plaintiffs
25 are entitled to be compensated for these unique risks and their broad release of claims, which were
26 not required of other Settlement Class Members. Plaintiffs estimate that they spent at least 20
27 hours performing these duties on behalf of the class.

1 31. I confirm that I am not affiliated with the proposed settlement administrator, ILYM
2 Group, Inc.

3 I declare under penalty of perjury under the laws of California and the United States that
4 the foregoing is true and correct. Executed on September 18, 2025, at El Segundo, California.

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8 Andrew J. Rowbotham
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EXHIBIT 1

10A
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Filed **MAY 09 2025**
STEPHANIE BOHRER, CLERK
By *[Signature]*
DEPUTY

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

JOSHUA D. HODGES, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

CALIFORNIA TRUCK CENTERS, LLC, a
California Limited Liability Company;
DELTA TRUCK CENTER, a California
Company; and DOES 1-50, inclusive,

Defendants.

CASE NO. STK-CV-UOE-2022-0000168

*[Assigned to Hon. George J. Abdallah, Dept.
10A]*

**~~PROPOSED~~ ORDER GRANTING
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: May 6, 2025
Time: 9:00 AM
Dept.: 10A

Action Filed: January 10, 2022
Trial Date: None Set

[PROPOSED] ORDER GRANTING MOTION FOR PRELIMINARY APPROVAL

ORIGINAL

FAXED

APR 11 2025

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Attorneys for Plaintiffs

1 Plaintiffs Joshua D. Hodges and Daniel Vogel ("Plaintiffs") Motion for Preliminary
2 Approval of Class Action Settlement came regularly for hearing before this Court on May 6, 2025
3 at 9:00 a.m. The Court, having considered the proposed Stipulation of Settlement (the "Settlement
4 Agreement"), attached as Exhibit A to the Declaration of Andrew J. Rowbotham filed
5 concurrently herewith; having considered Plaintiffs' Motion, Memorandum of Points and
6 Authorities in support thereof, and supporting declarations filed therewith; and good cause
7 appearing, HEREBY ORDERS THE FOLLOWING:

8 1. The Court GRANTS preliminary approval of the Settlement and finds that its
9 terms fall within the range of possible final approval. For settlement purposes only, the Court
10 conditionally certifies the following Settlement Class under California Code of Civil Procedure
11 § 382:

12 Settlement Class: All current and former non-exempt employees who worked for
13 Defendants in California between January 10, 2018 and January 18, 2025 (the
14 "Class Period").

15 2. The Court appoints Plaintiffs Joshua D. Hodges and Daniel Vogel as Class
16 Representatives, and appoints Paul K. Haines, Fletcher W. Schmidt, and Andrew J. Rowbotham
17 of Haines Law Group, APC; Mehrdad Bokhour of Bokhour Law Group, P.C.; Joshua S. Falakassa
18 of Falakassa Law, P.C.; and Roman Otkupman of Otkupman Law Firm as Class Counsel.

19 3. The Court appoints ILYM Group, Inc. as the Settlement Administrator.

20 4. The Court approves, as to form and content, the Notice of Class and PAGA Action
21 Settlement ("Class Notice"), attached as Exhibit B to the Rowbotham Declaration.

22 5. The Court finds that the proposed method of notice to the Settlement Class
23 constitutes the best practicable notice under the circumstances and satisfies the requirements of
24 California Code of Civil Procedure § 382, Civil Code § 1781, Rules of Court 3.766 and 3.769,
25 and due process.

26 6. The Court approves the procedures for Settlement Class Members to opt out of or
27 object to the Settlement, as set forth in the Class Notice, and finds that these procedures are fair,
28 reasonable, and designed to protect the due process rights of all Class Members.

1 7. The Court directs the Settlement Administrator to distribute the Class Notice in
2 accordance with the terms of the Settlement Agreement and to carry out all duties required under
3 the Settlement.

4 8. The Class Notice shall provide Settlement Class Members with at least 60 calendar
5 days from the mailing date to opt out of or object to the Settlement. Requests for Exclusion and
6 Objections shall be submitted directly to the Settlement Administrator and not filed with the
7 Court. The Settlement Administrator shall forward all such submissions to counsel for the Parties
8 and shall file a declaration with the Court concurrently with Plaintiffs' Motion for Final Approval
9 authenticating all Requests for Exclusion and Objections received. The Settlement Administrator
10 shall notify any objecting Class Member of any continuance of the Final Approval Hearing.

11 9. The Final Approval Hearing is set for October 13, 2025, at 9:00 a.m./p.m.
12 in Department 10A of this Court, located at 180 E. Weber Avenue, Stockton, California 95202,
13 to determine: (a) whether the Settlement should be finally approved as fair, reasonable, and
14 adequate; (b) whether judgment should be entered pursuant to the Settlement; and (c) whether to
15 approve Plaintiffs' requests for attorneys' fees, costs, enhancement payments, settlement
16 administration costs, and payment to the Labor and Workforce Development Agency pursuant to
17 PAGA.

18 10. Plaintiffs shall file their motion and supporting papers for final approval of the
19 Settlement, attorneys' fees, costs, enhancement payments, settlement administration costs, and
20 PAGA payment in accordance with applicable statutes and rules.

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11. The implementation schedule is set as follows (assuming the Court signs this Order on May 6, 2025):

Event	Date
Defendant to provide Class Member data to Settlement Administrator (10 business days after preliminary approval)	May 20, 2025 23 <i>SA</i>
Class Notice mailed to Class Members (10 business days after receiving data)	June 4, 2025 9 <i>SA</i>
Deadline to request exclusion, object, or dispute workweek count (60 calendar days after mailing)	August 4, 2025 8 <i>SA</i>
Deadline to file Motion for Final Approval	At least 16 court days before Final Approval Hearing
Final Approval Hearing	Oct. 13, 2025 at 9:00 a.m./p.m.

12. All proceedings in this action, other than those necessary to carry out the terms of the Settlement or this Order, are stayed pending the Final Approval Hearing.

13. The Parties are authorized to implement the Settlement in accordance with its terms and this Order.

IT IS SO ORDERED.

Dated: May 19, 2025

George J. Abdallah
Honorable George J. Abdallah
Judge of the Superior Court

EXHIBIT 2

Valerina Cifuentes

From: DIR PAGA Unit <no-reply@formassembly.com>
Sent: Friday, April 11, 2025 11:12 AM
To: Valerina Cifuentes
Subject: Thank you for your Proposed Settlement Submission

04/11/2025 11:10:15 AM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm



State of California
Labor and Workforce Development Agency /
Department of Industrial Relations

Private Attorneys General Act (PAGA) – Filing

Proposed Settlement of PAGA case

PAGA Number (LWDA-CM-) : *

Please enter only the numbers after "LWDA-CM-" in the following format, "XXXXXXXXXX-XX".
[Search for PAGA Case number](#)

The timing of the deposit of settlement checks is governed by the provisions of the State Administrative Manual. This ministerial, administrative act of depositing a settlement check mandated by state procedures should not be construed as nor does it constitute an unconditional, voluntary and/or absolute acceptance of settlement proceeds or approval of the terms of any settlement agreement or judgment related to that check.

Your Information (Person Who is Filing)

Your First Name *

Your Last Name *

Your Email Address *

Your Street Name, Number and Suite/Apt *

Your Mobile Phone Number

Your City *

Your Work Phone Number

Your State *

Your Zip/Postal Code *

Court and Hearing Information

Court *	Court Case Number *	Hearing Date (if any)
Superior Court of The Stat	STK-CV-UOE-2022-0000	May 6, 2025
Hearing Time	Hearing Location	Number of aggrieved employees *
9:00 am	180 E. Weber Ave. Stockto	1415
Gross settlement amount *	Gross penalty amount *	Penalties to LWDA *
3665904.98	100000.00	75000.00
Date of proposed settlement *		
04/10/2025		

Proposed Settlement and Other Documents

Proposed Settlement (must be .pdf) *

Choose FileExhibit A – H...ent (FINAL).pdf

Other Attachment (if any, must be .pdf)

Choose File1. 2025-04-...y Approval.pdf

Other Attachment (if any, must be .pdf)

Choose File2. 2025-04-... PA Motion.pdf

[Remove](#)

Other Attachment (if any, must be .pdf)

Choose File3. 2025-04-...A Truck PA.pdf

[Remove](#)

Other Attachment (if any, must be .pdf)

Choose File4. 2025-04-...A Truck PA.pdf

[Remove](#)

Other Attachment (if any, must be .pdf)

Choose File5. 2025-04-...A Truck PA.pdf

[Remove](#)

Other Attachment (if any, must be .pdf)

Choose File6. 2025-04-...A Truck PA.pdf

[Remove](#)

Other Attachment (if any, must be .pdf)

Choose File7. 2025-04-...A Truck PA.pdf

[Remove](#)

Other Attachment (if any, must be .pdf)

[Remove](#)

8. 2025-04-... Center PA.pdf

Other Attachment (if any, must be .pdf)

[Remove](#)

9. 2025-04-...Centers PA.pdf

Other Attachment (if any, must be .pdf)

[Remove](#)

10. 2025-04...Centers PA.pdf

Other Attachment (if any, must be .pdf)

[Remove](#)

11. 2025-04...A Truck PA.pdf

Other Attachment (if any, must be .pdf)

[Remove](#)

2025-04-11 ... of Service.pdf

[Add Another Attachment](#)

LWDA requests that settling parties provide copies of supporting documents, including memorandum of points and authorities and declaration of counsel filed with the court, to assist LWDA in evaluating proposed settlement agreements.

Should you have questions regarding this online form, please contact PAGInfo@dir.ca.gov

IMPORTANT NOTICE OF REDACTION RESPONSIBILITY: All filers must redact: Social Security or taxpayer identification numbers; personal addresses, personal telephone numbers, personal email addresses, dates of birth; names of minor children; & financial account numbers. This requirement applies to all documents, including attachments.

☒ **I understand that, if I file, I must comply with the redaction rules consistent with this notice.**

From: [DIR PAGA Unit](#)
To: [Jonathan Ramirez](#)
Subject: Thank you for your Court Order or Judgment Submission
Date: Wednesday, May 14, 2025 4:43:28 PM

05/14/2025 04:43:11 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Court Order or Judgment

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm



Private Attorneys General Act (PAGA) – Filing

Court Order or Judgment in PAGA case

PAGA Number (LWDA-CM-) : *

Please enter only the numbers after "LWDA-CM-" in the following format, "XXXXXXXXXX-XX".

[Search for PAGA Case number](#)

Your Information (Person Who is Filing)

Your First Name *

Andrew

Your Last Name *

Rowbotham

Your Email Address *

jamirez@haineslawgroup.

Your Street Name, Number and Suite/Apt *

2155 Campus Drive

Your Mobile Phone Number

Your City *

El Segundo

Your Work Phone Number

4242922350

Your State *

California

Your Zip/Postal Code *

90245

Court Case Name and Plaintiff Information

Court Case Name

Joshua D. Hodges v. Calif

Plaintiff Name

Joshua D. Hodges

Order or Judgment Details

Date Court order signed by Judge *

05/09/2025

Gross Settlement/Court Order Amount *

3665904.98

Gross Penalties Per Court Order *

100000.00

Penalties to LWDA *

75000.00

Fee award *

1221968.33

Court Order.Judgment File and Other Files

Court Order or Judgment *

Choose File 2025-05-09 ...PA Motion.pdf

Other Attachment

Choose File No file chosen

[Add Another Attachment](#)

Should you have questions regarding this online form, please contact PAGInfo@dir.ca.gov

IMPORTANT NOTICE OF REDACTION RESPONSIBILITY: All filers must redact: Social Security or taxpayer identification numbers; personal addresses, personal telephone numbers, personal email addresses, dates of birth; names of minor children; & financial account numbers. This requirement applies to all documents, including attachments.

☒ I understand that, if I file, I must comply with the redaction rules consistent with this notice.

Previous Page

Submit

EXHIBIT 3

Hodges and Vogel v. California Truck Centers, LLC , et al.

Additional Charges :

			<u>Qty/Price</u>	<u>Amount</u>
12/31/2023	ALL	Copying cost for December, 2023.	6 0.25	1.50
3/1/2024	ALL	Ortman mediation fee for September 20, 2024 mediation. Invoice #: [REDACTED]	1 5,000.00	5,000.00
3/31/2024	IDLC	FedEx costs for March 2024.	1 8.45	8.45
	ALL	Copying cost for March, 2024.	1 0.25	0.25
5/16/2024	ALL	First legal's filing fee for: Joint status, POS File/Conform/Return "Advance Fees" Order #: [REDACTED] Filing - Branch PDF Same Day Base charge + Wait + Fuel charge	1 113.02	113.02
5/22/2024	ALL	First Legal Depo Transcript Cost for Depo of Cynthia Campa and Remote Services fees on 5/2/24 - Invoice # [REDACTED]	1 5,288.00	5,288.00
5/31/2024	ALL	Westlaw cost for May, 2024.	1 2.57	2.57
9/17/2024	ML	Expert fee for BRG. For services rendered through August 31, 2024 Invoice No: [REDACTED]	1 9,093.00	9,093.00
10/1/2024	VG	First Legal's filing fee for: 2024-10-01 Cal Truck Centers Joint Notice of Settlement and Stip to Vacate Trial Setting Conference, 2024-10-01 Proof of Service Advance the fee for stipulations and orders Advance Fees Order #: [REDACTED] Filing-Branch PDF Same Day	1 144.87	144.87

		<u>Qty/Price</u>	<u>Amount</u>
	Base Charge + Wait + Fuel Charge + Adv/Wit Ck + Check Charge		
10/4/2024 ML	Expert fee for BRG. For services Rendered through September 30, 2024. Invoice #: [REDACTED]	1 28,138.50	28,138.50
10/31/2024 ML	Copying cost for October, 2024.	3 0.25	0.75
1/9/2025 ALL	First legal's service fee for Joint Stip and POS FILE/CONFORM/RETURN ADVANCE FEES Order #: [REDACTED]	1 163.77	163.77
1/16/2025 ML	First legal's Filing fee for Third Amended Complaint and POS FILE/CONFORM/RETURN ADVANCE FEES Signed: FILED Order #: [REDACTED]	1 130.37	130.37
1/31/2025 ML	Postage for January, 2025.	1 8.72	8.72
ML	Copying cost for January, 2025.	14 0.25	3.50
4/11/2025 ML	First Legal's Filing fee for NTC OF MOTION;PO;DEC;DEC;DEC;DEC;DEC;DEC;DEC;DEC;DEC;POS FILE/CONFORM/RETURN ADVANCE FEES Order #: [REDACTED]	1 273.62	273.62
4/30/2025 ML	Westlaw cost for April, 2025.	1 78.36	78.36
9/30/2025 ML	Copying cost for September, 2025.	1 0.25	0.25
Total additional charges			<u>\$48,449.50</u>
Balance due			<u><u>\$48,449.50</u></u>

EXHIBIT 4



INVOICE

September 17, 2024

Services Rendered Through August 31, 2024

\$ 9,093.00 USD

\$ 9,093.00 USD

Please direct questions regarding this invoice to: [REDACTED]

[illegible]

Via Email: adparashos@haineslawgroup.com



To: Paul Haines
c/o: Haines Law Group
RE: California Truck Centers

Page 2 of 3
Invoice # [REDACTED]
Client-Project: [REDACTED]

Services Rendered Through August 31, 2024

PROFESSIONAL SERVICES

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Managing Director			
Jon M. DuMond	675.00	1.00	675.00
Senior Managing Consultant			
Brooke Truitt	460.00	12.30	5,658.00
Robert Schmalfuss	460.00	6.00	2,760.00
Total Professional Services		19.30	9,093.00



To: Paul Haines
c/o: Haines Law Group
RE: California Truck Centers

Page 3 of 3
Invoice # [REDACTED]
Client-Project: [REDACTED]

Services Rendered Through August 31, 2024

DETAIL OF PROFESSIONAL SERVICES

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
08/29/24	Robert Schmalfuss	Reviewing PDF materials.	4.00
08/29/24	Brooke Truitt	Reviewed PDFs;Converted PDFs.	7.80
08/30/24	Jon M. DuMond	Case discussions; review data.	1.00
08/30/24	Robert Schmalfuss	Reviewing PDF materials and case discussions.	2.00
08/30/24	Brooke Truitt	Converted PDFs;Prepared data.	4.50
Professional Services			19.30



INVOICE

October 04, 2024

Services Rendered Through September 30, 2024

\$ 28,138.50 USD

\$ 28,138.50 USD

Please direct questions regarding this invoice to: [REDACTED]

[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]

CC:

Via Email: adparashos@haineslawgroup.com



To: Paul Haines
c/o: Haines Law Group
RE: California Truck Centers

Page 2 of 3
Invoice # [REDACTED]
Client-Project: [REDACTED]

Services Rendered Through September 30, 2024

PROFESSIONAL SERVICES

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Managing Director			
Jon M. DuMond	675.00	3.10	2,092.50
Senior Managing Consultant			
Brooke Truitt	460.00	44.50	20,470.00
Associate			
Jackson Burks	295.00	11.30	3,333.50
Marjorie Moore	195.00	11.50	2,242.50
Total Professional Services		70.40	28,138.50



To: Paul Haines
c/o: Haines Law Group
RE: California Truck Centers

Page 3 of 3
Invoice # [REDACTED]
Client-Project: [REDACTED]

Services Rendered Through September 30, 2024

DETAIL OF PROFESSIONAL SERVICES

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
09/02/24	Brooke Truitt	Converted PDFs.	4.40
09/03/24	Jackson Burks	Data Entry.	6.50
09/03/24	Jon M. DuMond	Case discussions/data entry project.	1.30
09/03/24	Marjorie Moore	Data entry.	7.00
09/04/24	Jackson Burks	Data entry.	4.30
09/04/24	Marjorie Moore	Data entry, check entry.	4.50
09/04/24	Brooke Truitt	Prepared data.	6.90
09/05/24	Brooke Truitt	Prepared data.	6.50
09/06/24	Brooke Truitt	Prepared data.	6.30
09/09/24	Brooke Truitt	Prepared data.	0.70
09/10/24	Brooke Truitt	Prepared data.	0.40
09/11/24	Brooke Truitt	Analyzed data.	1.40
09/12/24	Brooke Truitt	Prepared data;Analyzed data.	7.50
09/13/24	Brooke Truitt	Analyzed data.	7.10
09/16/24	Jackson Burks	Updated data entry.	0.50
09/16/24	Jon M. DuMond	Case discussions; review analyses.	1.80
09/16/24	Brooke Truitt	Analyzed data.	3.30
Professional Services			70.40

EXHIBIT 5