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Attorneys for Plaintiffs

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

FELIX GUNAWAN, TAJE FLEMING, TOMA
STAVREV, SAIF AHMED, IRWANDIE TIO,
XAVIER BROWN, individuals, on behalf of
themselves and on behalf of all persons
similarly situated and on behalf of the State of
California, as a private attorney General,

Plaintiffs,

vs.

TRANSEV ALTERNATIVE SERVICES,
INC., a Corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: CGC-22-599234

Honorable Joseph M. Quinn
Department 302

CLASS ACTION

**DECLARATION OF XAVIER BROWN
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date:
Time:
Department: 302

Complaint Filed: April 3, 2024
FAC Filed: July 14, 2025
SAC Filed: September 19, 2025
Trial Date: Not Set

DECLARATION OF XAVIER BROWN

I, Xavier Brown, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the representative action entitled *Xavier Brown v. Transdev Alternative Services, Inc.*, San Francisco Superior Court, Case No. CGC-23-610067 (the "*Brown* PAGA Action"), filed on October 23, 2023 in San Francisco Superior Court, which claims and Parties were included in the Second Amended Complaint filed in the above-captioned action. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Transdev Alternative Services, Inc. ("Defendant") from approximately September 2021 to approximately September 2022 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers for Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for not properly compensating its employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers for Justice, PC discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative. Prior to commencing the *Brown* PAGA Action, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the *Brown* PAGA Action, I have spent time speaking with my attorneys regarding the cases and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys

1 and their staff to make sure that they had all of my most current information and any additional
2 information that I had obtained.

3 4. Throughout this matter, I was available to answer any questions my attorneys had,
4 and available to speak and meet with my attorneys whenever they needed me. I responded to them
5 as quickly as possible and gave them as much information and identified as many documents as I
6 could. I spent time speaking with my attorneys about the cases, identifying potential witnesses,
7 providing my attorneys with documents and information concerning the *Tio* Actions, and also
8 describing policies, practices, and procedures of Defendant.

9 5. As far as the settlement is concerned, I was available to review documents and
10 answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the
11 Settlement Agreement and discussed the questions I had regarding the potential settlement with my
12 attorneys before signing the settlement papers.

13 6. I understand that a settlement has been reached in my case and what my duties and
14 responsibilities are as a class and PAGA representative. For example, I am aware that if the
15 settlement is granted preliminary approval, the Court will certify a class for settlement purposes,
16 and likely appoint me as the representative of the class and my attorneys as counsel for the class. I
17 also understand that my duties will include checking in on, monitoring, and conferring with my
18 attorneys to facilitate the notice and settlement administration process, and to provide information
19 that the Court needs in order to assess whether the settlement is fair, reasonable, and adequate.
20 Further, if any individuals who are potential class members contact me, I will take steps to have
21 them referred to the Court-appointed settlement administrator so that these individuals may receive
22 the necessary information and notice they may be eligible to receive in connection with the
23 settlement and contemplated final approval hearing.

24 7. I believe that I have done everything that my attorneys have asked of me and have
25 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class
26 members and the State of California with respect to aggrieved employees. I have volunteered to
27 represent and champion the interests of many other people with similar claims and injuries because
28 of the importance of the cases and the necessity that all class members and aggrieved employees

benefit from the lawsuit equally. I understand that as a proposed class representative, and if formally appointed as a class representative, I have and continue to represent the interests of all members of the class in litigation to recover relief for the class. As an hourly-paid non-exempt employee of Defendant who was subject to the same policies, practices, and procedures as the other members of the class, I have claims that are typical of those of the class. I consider the interests of the class just as I would consider my own interests. I understand that I may need to put the interests of the class before my own interests, although I have no reason to believe that my interests are in conflict with the interests of the class. I understand that any resolution of the lawsuit is subject to court approval and must be in the best interest of the class as a whole. I have participated, and continue to participate, in the lawsuit as necessary. I have actively followed and monitored the progress of the lawsuit, and have taken steps to make sure that the litigation is prosecuted by the skilled and effective attorneys that I have retained.

8. I think my efforts helped to get the result obtained in this matter, and as a potential class and PAGA representative, I respectfully request that the Court award me an enhancement award for my efforts in pursuing and participating in this matter, as well as my broader release of claims. Taking into consideration the time that I have dedicated to this matter, I believe that this amount is reasonable.

9. I am not related to anyone associated with Lawyers *for* Justice, PC or Blumenthal Nordrehaug Bhowmilk De Blouw LLP.

10. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as an enhancement award, as well as my share of the settlement as a class member and aggrieved employee.

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

08/07/2025
Executed on this ____ day of August 2025, at Richmond, California.

Electronically Signed 2025-08-07 22:37:43 UTC - 104.28.111.132

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Xavier Brown