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Attorneys for Plaintiffs

SUPERIOR COURT FOR THE STATE OF CALIFORNIA

COUNTY OF SAN FRANCISCO

FELIX GUNAWAN, TAJE FLEMING, TOMA
STAVREV, SAIF AHMED, IRWANDIE TIO,
and 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.

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

Defendants.

CASE NO.: CGC-22-599234

**DECLARATION OF TAJE FLEMING IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
SETTLEMENT**

Hearing Date: December 16, 2025

Hearing Time: 9:00 a.m.

Judge: Hon. Joseph M. Quinn

Dept.: 302

Date Action Filed: April 19, 2022

Trial Date: Not set

1 I, Taje Fleming, declare as follows:

2 1. I am over the age of eighteen, a Plaintiff and a proposed Class Representative in the above-entitled
3 matter. I submit this declaration in support of the Motion for Preliminary Approval of Class Settlement
4 and in support of my application for a class representative service payment.

5 2. I have personal knowledge of all the facts stated herein. I could and would competently testify
6 under oath to these facts in court if requested to do so.

7 3. I worked for the defendant Transdev Alternative Services, Inc. ("Transdev") in California from
8 August of 2021 to December of 2021, and during that time period I was classified by Transdev as a non-
9 exempt employee.

10 4. I retained my attorneys who are experienced in both class action and PAGA representative action
11 litigation and claims against employers for violations of the California Labor Code. I have no personal
12 relationship or family ties to my attorneys or any officer of the Court. I am not aware of having any actual
13 or potential conflicts of interest with another class member in this case. I am not aware of any other
14 pending matter or action asserting claims that will be extinguished or adversely affected by this settlement.

15 5. I decided to file this class action lawsuit and be a plaintiff/class representative because I felt that
16 my legal rights as an employee and others like me were violated. For example, I was forced to work off
17 the clock, as I was required to submit to COVID-19 temperature checks prior to clocking in. I was also
18 forced to service the work vehicles while clocked out, and trainings were regularly conducted either prior
19 to clocking in or after clocking out for the day. I rarely received compliant meal and rest breaks which
20 were often late, interrupted, or missed completely. Further, I was not reimbursed for the use of my personal
21 cell phone and personal computer which were essential tools necessary to perform my job duties.

22 6. I spoke to my attorneys several times and discussed how Transdev implemented its company
23 policies and procedures. I also assisted my attorneys in their investigation into my claims by providing
24 them documents and answering their questions. I reviewed the complaint before it was filed and was
25 given access to an electronic file sharing program that alerted me via email when important documents
26 were filed so that I could review them and keep up with the developments in the case which I understood
27 was one of my duties as a class representative. I could also access court filings from this case on my
28 attorney's law firm website. Also, I was informed that Transdev had the right to take my deposition, and

1 that the preparation and deposition itself could take multiple days. Although my deposition was not taken,
2 I feel I would have been adequately prepared and comfortable to give testimony on my experiences.

3 7. Even though this action is in the process of settling, I was and remain prepared to perform all the
4 duties of a class representative. I understand that as a class representative I have assumed a fiduciary
5 responsibility to prosecute this class action on behalf of the absent class members. I have understood that
6 as a fiduciary, I have a duty to prosecute this action for the benefit of the class members and surrender any
7 right to compromise the group action for an individual gain.

8 8. I understood that being a plaintiff/class representative in this case meant that I was seeking
9 damages not only for myself but also other current and/or former non-exempt employees working for
10 Transdev in California who make up the class. I felt that these individuals were not aware of their labor
11 law rights and even if they were they would probably be apprehensive about speaking up or even simply
12 because of the time, effort and risk involved in filing a class action lawsuit.

13 9. I understood that being a part of this lawsuit involved risks. For example, my attorneys explained
14 to me that if the case went to trial and we lost, I could be held responsible to pay for all or part of the
15 attorney fees and costs paid by Transdev to defend this lawsuit. Also, I knew there was a risk that future
16 employers, if they ever find out about this lawsuit, could hold it against me or downgrade me as a potential
17 hire. As a named Plaintiff in this case it would not be difficult for a future employer to become aware that
18 I sued a former employer for labor law violations. Ultimately, I decided these risks were worth it and
19 decided to fight for my rights and the rights of others regardless of the risks, time and effort I spent on this
20 case.

21 10. During the lawsuit I stayed in touch with my attorneys by phone and email. I also kept up to date
22 on important developments by reviewing court filings that were made available to me electronically as I
23 described above.

24 11. A mediation took place on October 23, 2024, with Paul Grossman, a well-respected and
25 experienced mediator of wage and hour class actions. After the mediation the parties were able to come
26 to an agreement to settle the action. I communicated with my attorneys regarding the terms of the
27 settlement which was reached between the parties and understood that I was representing absent class
28 members and therefore wanted the best possible result to be obtained for the class members and I believe

1 a very positive result was in fact achieved via settlement. I reviewed and signed the Memorandum of
2 Understanding and when the final settlement agreement was ready, I reviewed it closely and signed it.

3 12. I have been actively involved with this lawsuit performing the duties described above. Although
4 I did not keep time records, I was in regular contact with my attorneys, reviewed court filings and spent a
5 significant amount of time on the issues presented during the lawsuit and in the settlement process. I
6 estimate that I spent approximately 30-40 hours working on this case up until this point. I believe I have
7 been diligent and have done what is expected of a named plaintiff and a proposed class representative to
8 date, and will continue to do so. I have and always will maintain the best interest of the class members.

9 13. My attorneys explained to me that the settlement process involves a two-step review by the Court
10 to determine whether the settlement is fair before approving the settlement. I know this process also
11 involves notifying all class members of the settlement terms and of their rights to make a claim for their
12 settlement share, to opt out of the settlement or to object to the settlement.

13 14. I believe I did the right thing by filing this case on behalf of the class members who, subject to
14 court approval, are in line to receive monetary payments as a result of this case and settlement. This is
15 money they may never have ever gotten if I did not pursue this action on their behalf. I feel significant
16 personal satisfaction to know that I played a role in the class members being entitled to monetary payments
17 as a result of the filing of this lawsuit. I also believe that the requested class representative service award
18 of \$15,000 from the settlement is fair compensation for the work I performed and the risks I undertook.

19 15. As part of the settlement, it was necessary for me to sign a general release of claims I may have
20 against Transdev. I believe the class representative service payment I have requested provides me with
21 some compensation for this agreed release.

22 16. In light of all the time and effort I have spent on this case, the risk I undertook by suing a former
23 employer, the exposure to being responsible for paying Transdev costs in the event we did not win the
24 case, the reputational risk that future employers may hold this lawsuit against me, the general release and
25 in light of the size of the settlement, I believe the request for \$15,000 as a class representative service
26 payment is fair and reasonable.

27 ///

28 ///

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

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4 Executed on 11/05/2025, at American Canyon, California.
5 (date) (city, state)

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7 Taje Fleming (Nov 5, 2025 11:34:48 PST)
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