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SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN DIEGO

MARCELINO ORTUNO, Individually, and on behalf of other members of the general public similarly situated,

Plaintiff,

v.

THE HERTZ CORPORATION, a Delaware Corporation; DTG OPERATIONS, INC., an Oklahoma Corporation; and DOES 1-10, inclusive,

Defendants.

CASE NO: 37-2022-00006731-CU-OE-CTL
 Assigned to Hon. Carolyn M. Caietti, Dept. C-70

CLASS ACTION

DECLARATION OF PLAINTIFF ANUAR ROMO IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Date: April 4, 2025
Time: 10:30 a.m.
Dept.: C-70

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Attorneys for Plaintiff, ANUAR ROMO on behalf of himself and others similarly situated

DECLARATION OF ANUAR ROMO

I, Anuar Romo, hereby declare as follows:

1. I am an individual over the age of eighteen (18). I have personal knowledge of the facts stated in this declaration and could and would testify to those facts if called upon to do so. I am also one of the named plaintiffs in the above-caption case. I am submitting this declaration in support of Plaintiffs' Motion for Final Approval of Class Action and PAGA Settlement.

2. I worked for The Hertz Corporation ("Hertz") since 1994 as a courtesy driver in Los Angeles, California.

3. Around October 2022, I decided to meet with an attorney to address the harsh conditions I faced working for Hertz. I knew the issues I faced on a regular basis as a courtesy driver were a problem experienced by others who worked for Hertz. So, after learning about the duties and procedures involved with representing the interests of a class of other workers like me, I decided I wanted to serve as a class representative.

4. I knew being a class representative was a serious and time-consuming commitment, but I felt a sense of duty to work on behalf of my coworkers who had faced the same difficulties working for Hertz as I did. Even though I understood Hertz could seek to recover its costs of this lawsuit if it won the case against me, I still decided to go forward as a class representative because I felt it was important to stand up for my coworkers who were too afraid to come forward on their own. Moreover, I was made aware I would likely have to agree to a broader release compared to other Class Members if I chose to serve as a class representative.

5. Being a class representative was a big commitment. It required taking personal time out of my schedule to assist my attorneys and give them important information about Hertz and my employment. This included providing information about Hertz's corporate policies and practices. I also had many phone calls and email exchanges with my attorneys. Furthermore, I gave my attorneys lengthy interviews about my experiences to help them prepare the legal documents. As the case progressed, I searched for and turned over papers related to my job with Hertz. In addition, I have read many case documents, including the letter we submitted to the California Labor Workforce Development Agency, the operative complaint we submitted to this Court, documents produced by

1 Hertz, discovery responses provided by Hertz, and the Settlement Agreement.

2 6. I have also taken seriously my responsibility as one of the class representatives to stay
3 informed of what was happening in the lawsuit. Throughout the case, I had many conversations with
4 my attorneys about the documents, evidence, and legal strategy. Some of these conversations have
5 been very long, sometimes involving more than one conversation or email back and forth in a day.

6 7. After extensive formal discovery, informal negotiation between my counsel and
7 Hertz's counsel, and weeks of having conversations with my attorneys as to legal strategy and
8 settlement, we agreed to a global settlement of the case. After further discussions with my attorneys
9 as to proposed settlement terms, we agreed to the basic terms of the settlement.

10 8. I participated in several conversations with my attorneys regarding the drafting of the
11 Settlement Agreement. As part of the Settlement Agreement, I am releasing any and all claims I have
12 against Hertz, not just those relating to this case. This broader release also included voluntarily
13 waiving the rights described in Civil Code section 1542. I understand this release is broader than that
14 which applies to the other Class Members.

15 9. In becoming one of the class representatives, I faced the risk that initiating the case
16 could potentially hurt my future employment possibilities with another employer because I would be
17 looked at as a troublemaker and litigious. As I mentioned above, I also faced the risk Hertz might go
18 after me for litigation costs if they won the case against me. This was in addition to having to agree
19 to a broader release compared to other Class Members, as stated above. Furthermore, I have not
20 received any benefits in performing my services as one of the class representatives. Despite these
21 risks and sacrifices, I decided representing the Class was the right thing to do and that it was important
22 Hertz follow the law in how they treat and pay their workers.

23 10. Considering the time that I have put into this case since the original meetings and
24 conversations in October 2022 through the present, including my continued commitment to the case
25 and the risks that came with being one of the named plaintiffs, I respectfully request the Court grant
26 a Class Representative Enhancement Payment of up to \$10,000, in an amount the Court deems to be
27 fair and appropriate. I believe a significant award is warranted because of the result achieved, the
28 many hours of my personal time I have invested in the case, my commitment to seeing it through to

a strong settlement for my co-workers, and my release of all other claims I may have against Hertz. Collectively, I believe I spent approximately thirty (30) hours on this case gathering documents, meeting with my attorneys, speaking with my attorneys during the case, being available to answer questions, including for formal discovery, and reviewing and agreeing on terms for the settlement.

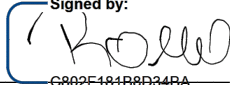
11. I have fairly represented the absent Class and herein request the Court approve this settlement and confirm me as one of the class representatives. I have always maintained the best interest of the Class while performing my class representative duties.

12. I am not aware of any conflicts of interest that prevent me from being confirmed as one of the class representatives in this lawsuit. Moreover, I am also not related to anyone associated with Bradley/Grombacher, LLP nor have I entered any undisclosed agreements or received any undisclosed compensation in this case.

13. I am both proud and grateful my work and participation in the case helped to pave the way for the successful settlement. I believe the settlement offers a very beneficial result for the other workers. I request the Court grant final approval to the class action settlement.

I declare under penalty of perjury under the laws of California the foregoing is true and correct and based on my personal knowledge.

This declaration is executed on 3/12/2025, 2025 at Los Angeles, California.

Signed by:

 ANUAR ROMO