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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

PARIS SPRY, individually, and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

vs.

JT-CGS MOTORS, INC., a California
corporation, and DOES 1 through 100, inclusive
Defendants.

Case No.: 22CV015162

Honorable Elizabeth Riles
Department 512

**DECLARATION OF PARIS SPRY IN
SUPPORT OF PLAINTIFF'S MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT (CAL. LABOR CODE § 2698
ET SEQ.) SETTLEMENT AGREEMENT AND
AWARD OF PAGA COUNSEL FEES
PAYMENT, PLAINTIFF'S GENERAL
RELEASE FEE, AND ADMINISTRATOR
EXPENSES PAYMENT**

Reservation ID: 460592549476
Date: April 29, 2025
Time: 2:30 p.m.
Department: 512

Complaint Filed: July 27, 2022
Trial Date: None Set

DECLARATION OF PARIS SPRY

I, Paris Spry, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. 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 JT-CGS Motors, Inc. ("Defendant") from approximately March 2021 to approximately December 2021 as an hourly paid Car Sales Associate. 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 misclassifying their employees as exempt and for their practice of not properly compensating their employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately **1.5 hours**. Thereafter, I consulted with the attorneys at Lawyers for Justice, **PC for 2.5 hours** discussing my situation, representative action lawsuits under the Private Attorney General Act ("PAGA"), and what it meant to bring a PAGA Action and be a PAGA representative.

3. I have spent over **11 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Defendant reviewing documents with my attorneys, providing information regarding the duties of aggrieved employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had and was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **8 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendant.

1 5. As far as the settlement is concerned, I was available to review documents and answer
2 any questions my attorneys had. I spent about **1.5 hours** reviewing the settlement agreement and about
3 **1 hour** asking questions and discussing the potential settlement with my attorneys before signing the
4 settlement agreement.

5 6. I believe that I have done everything that my attorneys have asked of me and have tried,
6 to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think
7 my efforts helped to get the result obtained in this ease.

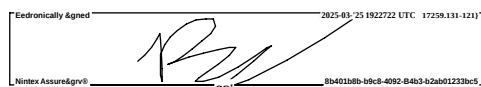
8 7. For my broader individual waiver and release of claims with a California Civil Code
9 Section 1542 waiver (as set forth in Sections 1.24, 3.2.2 and 5.1 of the PAGA Settlement Agreement),
10 the Settlement provides for a Plaintiff's General Release Fee in the amount of \$10,000.00, to be paid
11 out of the Gross Settlement Amount, subject to Court approval. I respectfully request that the Court
12 award me full payment of Plaintiff's General Release Fee.

13 8. I am not related to anyone associated with Lawyersfor Justice, PC.

14 9. I have not entered into any undisclosed agreements, nor have I received any undisclosed
15 compensation in this case. The only compensation I will receive is whatever amount the Court awards
16 as Plaintiff's general release fee, as well as my share of the settlement as an aggrieved employee.

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

19
20 Executed this 3/25/2025 day of March 2025, at San Leandro, California.

21
22
23 A rectangular box containing a handwritten signature in blue ink. Above the signature, the text "Electronically signed" is visible. To the right of the signature, the date and time "2025-03-25 19:27:22 UTC 172508.131-1211" are printed. Below the signature, the text "Nintex AssuredSign" is visible. To the right of the signature, a long alphanumeric string "8b401b8b-b9c8-4092-B4b3-b2ab01233bc5" is printed.

24 Paris Spry