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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

WALTER PORTILLO, an individual, on
behalf of the State of California, as a private
attorney general,

PLAINTIFF,

v.

FOX RENT A CAR, INC.; and DOES 1 thru
50, inclusive,

DEFENDANTS.

CASE NO. 22STCV19855

[Case Assigned for All Purposes to Hon. Judge
Wendy Chang in Dept. 36]

**SUPPLEMENTAL DECLARATION OF
WALTER PORTILLO IN SUPPORT OF
APPROVAL OF REPRESENTATIVE
ACTION SETTLEMENT**

Date: April 23, 2024
Time: 8:30 A.M.
Dept.: 36

Complaint Filed: June 17, 2022
Trial Date: August 9, 2024

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the matter of *WALTER PORTILLO, an individual, on behalf of the State of California, as a private attorney general*, v. *FOX RENT A CAR, INC.*, and DOES 1 thru 50, inclusive, Los Angeles County Superior Court, Case No. 22STCV19855. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto. I am making this sworn supplemental declaration in support of my claim and the claims of my co-workers, and in support of my qualifications as the named Plaintiff. If called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

3. I have spent significant time throughout this representative action working with PAGA Counsel. My work in connection with this case includes researching and identifying competent counsel with expertise with these types of employment matters. I knew that I needed to locate Counsel with specific experience in these types of employment actions. Once identified, I retained counsel because I believed they would do a good job handling this case. I also gathered all of the document sin my possession related to my employment with Fox and sent them to my attorneys. I made sure that I provided my lawyers with all of the employment documents that I had in my possession and information related to work experiences of myself and others that I have observed while working for Fox Rent A Car. Early in the case, I also had several telephone

1 conferences with my lawyers to discuss the alleged violations I suffered and the experiences of
2 others that I observed. After the lawsuit was filed, I stayed on top of the status of the case and
3 regularly check in about the case's progress with my attorneys. We had several long calls about
4 the status, setting up mediation, what to expect at mediation, and preparing for mediation.

5 4. Mediation was scheduled two times in this lawsuit. A mediation was initially
6 scheduled for August 8, 2023 with mediator Jeffrey Krivis. The mediation was then rescheduled
7 to August 18, 2023 with Mr. Krivis. I made myself available for both of these mediations so that I
8 could communicate and answer any questions with counsel throughout the day. I attended the
9 August 18th mediation via Zoom. The discussions that day, with my insights and input, ultimately
10 led to a favorable settlement.

11 5. Once the settlement agreement was formalized, I reviewed it carefully. Upon
12 signing the agreement, I discussed the next steps for the case with my attorneys.

13 6. I estimate the total time spent in connection with this matter is approximately 30-
14 35 hours.

15 7. Based upon my involvement in this case, I understand the merits of this settlement
16 and I strongly support the settlement and believe it is fair and reasonable, and in the best interest
17 of the aggrieved employees. I believe this Settlement will benefit the aggrieved employees.

18 8. It is my opinion that a fair and adequate representative enhancement for me as a
19 named Plaintiff is \$7,500.00. I believe that this amount is fair and reasonable in view of all of the
20 work I have performed in my role as a named Plaintiff. As a named Plaintiff, I actively participated
21 in all stages of the litigation as detailed above and have always maintained the best interest of the
22 aggrieved employees while performing my named Plaintiff duties.

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

25 Executed this 18th day of April, 2024 at San Francisco, California.

26
27 
28 _____
A1BA652B809A45A...
WALTER PORTILLO

(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On April 18, 2024, I served all interested parties in this action the following documents described as: **SUPPLEMENTAL DECLARATION OF WALTER PORTILLO IN SUPPORT OF APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

LITTLER MENDELSON, P.C.

Timothy Wojcik

TWojcik@littler.com

Tracy R. Leidner

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Fermin Llaguno

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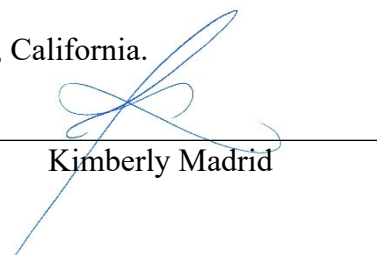
18565 Jamboree Road, Suite 800
Irvine, California 92612

[XX] (BY ELECTRONIC SERVICE): I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION): I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 18, 2024, at Los Angeles, California.



Kimberly Madrid