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Attorneys for Plaintiff, DAVID LAMOUNT
GAYLES, on behalf of herself and others
similarly situated.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

JOHN LEDBETTER, ROBERT AARON,
ANTONIO SEGOVIA, JOSEPH HICKS,
WILLIAM SHEARER, DAVID
LAMOUNT GAYLES, and JOSUE
BUENROSTRO on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

CJ LOGISTICS AMERICA, LLC, an
Illinois Limited Liability Company; and
DOES 1-50, inclusive,

Defendant.

Case No.: CIVSB2207118

*[Assigned for all purposes to the Hon. David E.
Driscoll, Dept. S22]*

**DECLARATION OF DAVID LAMOUNT
GAYLES IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: September 18, 2025

Time: 8:30 a.m.

Dept.: S22

I, David Lamount Gayles, declare as follows:

1. I am a Named Plaintiff and PAGA Representative in the case of *Ledbetter v. CJ Logistics America, LLC* San Bernardino Case No. CIVSB2207118. I make this declaration on the basis of my personal knowledge and if asked to testify thereto I could and would do so.

2. I was employed by CJ Logistics America, LLC (“CJ”) from on or about May 2020 through on or about April 29, 2022 and occupied a non-exempt position as a Warehouse Associate.

3. Prior to retaining the law firm of James Hawkins APLC to redress the grievances that I had against CJ, I was made aware of the advantages and disadvantages of litigation. I was also made aware of my responsibilities as both a Plaintiff and a class representative prior to filing the class action complaint which was filed on September 17, 2024 in Riverside County Case No. CVRI2405251. I accepted the responsibility and agreed to move forward. I also accepted the responsibilities as a named plaintiff and representative under the Private Attorneys General Act (“PAGA”). I pledged to participate actively in the lawsuits.

4. During the litigation of this action, I continuously interacted with my attorneys to discuss the status of the case and I provided oral and documentary information necessary to prosecute this case.

5. By agreeing to bring this action, I formally accepted the responsibilities of representing the interests of Aggrieved Employees in California and willingly chose to assume risks and potential costs that I alone might have to bear if judgement would have been rendered in favor of Satellite.

6. As part of the PAGA settlement, I also signed a general release releasing all claims I have or may have against Satellite which is far broader than the release by other Aggrieved Employees who are only releasing PAGA civil penalty claims. The incentive payout also serves as compensation for agreeing to a full, general release of all claims against Satellite.

7. I also risked the potential stigma of being the named plaintiff in a representative action labor dispute which could affect my further employability in the industry or with any prospective employer who learns of my lawsuit against a former employer. I have not found work

1 as a dialysis technician since bringing this lawsuit.

2 8. The incentive payout, subject to court approval, is Five Thousand Dollars
3 (\$5,000). I believe that this amount is fair and reasonable in light of the efforts and risks of
4 litigating this action as a class and PAGA representative which has resulted in a favorable
5 outcome to the Aggrieved Employees and class members. This incentive payment is also in
6 consideration for executing a general release of all my claims against Satellite.

7 I declare under penalty of perjury that the foregoing is true and correct.

8
9 Executed on this 28th day of March, 2025 at _____, Rancho, Cucamonga
10 _____, California.

11 Signed by:

12 

13 481E0360BC4D407

14 David Lamount Gayles
15 Plaintiff