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Attorneys for Plaintiff, JOSUE BUENROSTRO
7 on behalf of himself and all others and similarly situated
8

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF SAN BERNARDINO**

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

15 v.

16 CJ LOGISTICS AMERICA, LLC, an Illinois
Limited Liability Company; and DOES 1-50,
inclusive,
17

Defendant.

Case No.: CIVSB2207118

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

**DECLARATION OF JAMES R. HAWKINS
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PAGA ACTION SETTLEMENT**

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I, James R. Hawkins, declare as follows:

1. I am an individual over the age of 18. I am a partner at the law firm of James Hawkins, APLC. I am one of the attorneys of record for Plaintiff Renee Ramirez (hereinafter referred to as “Plaintiff” or “Class Representative”), who commenced this Class and PAGA action on behalf of the Class Members and Aggrieved Employees. I submit this declaration in support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement, which Plaintiff filed concurrently herewith, along with the supporting Memorandum of Points and Authorities. I have personal knowledge of the facts set forth below, and if called to testify regarding them, I could and would do so competently.

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- 1 Gallagher Bassett, a third party administrator (TPA) in the State of California.
2 Certification granted. Plaintiffs' counsel co-lead counsel. Case settled, Final
3 Approval granted, no objections and funds fully distributed.
- 4 c. *Dao v. 3M Company, et al.* USDC, CENTRAL DISTRICT, Case No. CV-08-
5 04554. Wage and Hour Class Action case seeking past wages for "off the clock",
6 overtime and meal and rest break violations for production workers in the State of
7 California. Plaintiff's Counsel appointed as Lead Counsel. Case settled, Final
8 Approval granted, no objections and funds fully distributed.
- 9 d. *Ortiz v. Kmart*, USDC, CENTRAL DISTRICT, Case No. SACV 06-638 ODW.
10 Wage and Hour Class Action case seeking past wages for meal and rest period
11 violations for retail employees in the State of California. Plaintiff's counsel
12 appointed co-lead counsel. Case settled, Final Approval granted, no objections
13 and funds fully distributed.
- 14 e. *Morgan v. Aramark Campus, LLC*, USDC, CENTRAL DISTRICT, Case No.
15 SACV08-00412. Wage and Hour Class Action case seeking past wages for meal
16 and rest period violations for retail employees in the State of California.
17 Plaintiff's Counsel appointed as Lead Counsel. Case settled, Final Approval
18 granted, no objections and funds fully distributed.
- 19 f. *West v Iron Mountain Information Management, Inc, et. al.*; Los Angeles County
20 Superior Court, Case No. BC393709. Wage and Hour Class Action seeking past
21 wages for overtime, meal and rest break violations for driver employees in the
22 State of California. Settlement for "binding arbitration." Arbitration Award for
23 Plaintiff Class. Arbitration Award confirmed. Plaintiff's counsel, lead trial
24 counsel and class counsel.
- 25 g. *Gonzalez v. Superior Industries Inter, Inc., et al.*, Los Angeles County Superior
26 Court, Case No. BC 357912. Wage and Hour Class Action seeking past wages
27 for overtime, meal and rest breaks violations for production employees in the
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1 State of California. Plaintiff's counsel appointed as lead counsel. Case settled,
2 Final Approval granted, no objections and funds fully distributed.

3 h. *Acosta v. Fleetwood Travel Trailers of California, Inc., et al.*, Riverside County
4 Superior Court, Case No. RIC 440630. Wage and Hour Class Action seeking past
5 wages for overtime, meal and rest break violations for production employees in
6 the State of California. Plaintiff's counsel appointed as co-lead counsel. Case
7 settled, Final Approval granted, no objections and funds fully distributed.

8 i. *Walker v. Sharkeez, et al.*, Orange County Superior Court, Case No.
9 05CC00293. Wage and Hour Class Action seeking past wages for unlawful
10 deductions, meal and rest break violations for restaurant employees in the State of
11 California. Plaintiff's counsel appointed as lead counsel. Case settled, Final
12 Approval granted and funds fully distributed.

13 j. *Padron v. Universal Protection Service, et al*, Orange County Superior Court,
14 Case No. 05CC00013. Wage and Hour Class Action seeking past wages for
15 overtime, meal and rest break violations for security officers in the State of
16 California. Plaintiff's counsel appointed as co-lead counsel. Case settled, Final
17 Approval granted, no objections and funds fully distributed.

18 k. *Martinez v. Securitas Security Services USA, et al.*, Santa Clara Superior Court,
19 Case No. 105-CV047499, et al. J.C.C.P. No. 4460. Wage and Hour Class Action
20 seeking past wages for meal and rest break violations for security officers
21 employed by defendant in the State of California. Plaintiff's counsel and co-
22 counsel. Case settled, Final Approval granted and funds fully distributed.

23 l. *Velasquez-Lopez v. Hotel Cleaning Services, Inc. et al.*, Riverside Superior Court,
24 Case No. RIC 420909. Wage and Hour Class Action seeking past wages for
25 overtime, meal and rest break violations for housekeepers employed by defendant
26 in the State of California. Plaintiff's counsel appointed as lead counsel. Case
27 settled, Final Approval granted, no objections and funds fully distributed.
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- 1 m. *Ruiz, et al. v. Unisourse Worldwide, Inc., et al.*, USDC, CENTRAL DISTRICT,
2 Case No. CV09-05848. Wage and Hour Class Action seeking past wages for
3 meal and rest period violations for non-exempt employees employed by defendant
4 in the state of California. Case settled. Awaiting Preliminary Approval hearing.
5 Plaintiff has petitioned the Court for Lead Counsel.
- 6 n. *Herrador v. Culligan International Company, et al.*, USDC, CENTRAL
7 DISTRICT, Case No. SACV 08-680. Wage and Hour Class Action seeking past
8 wages for field and branch employees of defendant in the State of California.
9 Plaintiff's counsel appointed as lead counsel. Case settled and awaiting Final
10 Approval.
- 11 o. *Defries v. Domain Restaurants, et al.*, Orange County Superior Court, Case No.
12 05CC00128. Wage and Hour Class Action seeking past wages for restaurant
13 employees of defendant in the State of California. Plaintiff's counsel appointed
14 as lead counsel. Case settled, Final Approval granted, no objections and funds
15 fully distributed.
- 16 p. *Denton v. BLB Enterprises, Inc., et al.*, Orange County Superior Court, Case No.
17 07CC01292. Wage and Hour Class Action seeking unpaid overtime, meal and
18 rest break violations for security guards employed by defendant in the State of
19 California. Plaintiff's counsel appointed as lead counsel. Case settled, Final
20 Approval granted, no objections and funds fully distributed.
- 21 q. *Rios v. Sandberg Furniture Manufacturing Co., Inc, et al.*, Los Angeles Superior
22 Court, Case No. BC411477. Wage and Hour Class Action seeking unpaid meal
23 and rest break violations for production employees employed by defendant in the
24 State of California. Plaintiff counsel appointed as lead counsel. Case settled,
25 Final Approval granted, no objections and funds fully distributed.
- 26 r. *McMurray v. Dave and Busters, Inc., et al.*, Orange County Superior Court, Case
27 No. 06CC00099. Wage and Hour Class Action seeking past wages for meal and
28 rest break violations for restaurant employees employed by defendant in the State

- 1 of California. Plaintiff's counsel appointed as co-lead counsel. Case settled,
2 Final Approval granted, no objections and funds fully distributed.
- 3 s. *Osuna v. DFG Restaurants, Inc., et al.*, Los Angeles Superior Court, Case No. BC
4 330145. Wage and Hour Class Action seeking past wages of overtime for mis-
5 classification of managers employed by Defendant, DBA Carl's Jrs. in the State
6 of California. Plaintiff's counsel appointed as co-lead counsel. Case settled,
7 Final Approval granted, no objections and funds fully distributed.
- 8 t. *Burns v. Gymboree Operations, Inc., et al.*, San Francisco Superior Court, Case
9 No. CGC-07-461612. Wage and Hour Class Action seeking past wages for meal
10 and rest break violations for retail employees employed by defendant in the State
11 of California. Plaintiff's counsel appointed lead counsel. Case settled, Final
12 Approval granted, no objections and funds fully distributed.
- 13 u. *Willems v. Diedrich Coffee, Inc., et al.*, Orange County Superior Court, Case No.
14 07CC00015. Wage and Hour Class Action seeking past wages of overtime for
15 mis-classification of managers employed by Defendant in the State of California.
16 Plaintiff's counsel appointed lead counsel. Case settled, Final Approval granted,
17 no objections and funds fully distributed.
- 18 v. *Davila, et al. v. Beckman Coulter, Inc., et al.*, Orange County Superior Court,
19 Case No. 07CC01347. Wage and Hour Class Action seeking past wages for
20 overtime, meal and rest break violations for production workers employed by
21 defendant in the State of California. Plaintiff's counsel appointed lead counsel.
22 Cased settled; final approval granted; no objections and funds fully distributed.
- 23 w. *Perez v. Naked Juice Company of Glendora, Inc.*, Los Angeles Superior Court,
24 Case No. BC387088. Wage and Hour Class Action seeking past wages for
25 overtime, meal and rest period violations for production employees employed by
26 defendant in the State of California. Plaintiff counsel appointed as lead counsel.
27 Case settled, Final Approval granted, no objections and funds fully distributed.
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5. Ms. Fernandez, my co-counsel on this matter, has been a member of the Florida Bar since January 1996 and member of the California Bar since August 2002. Ms. Fernandez has specialized in employment-related litigation including complex wage and hour civil litigation since 2003. Ms. Fernandez has been, and currently is, co-counsel in over 40 wage and hour class action litigations for our firm and has produced excellent results for this firm's clients in wage and hour class actions.

6. Mr. Draper, an associate who worked on this matter, has been a member of the California Bar since July 2022, and was provisionally licensed prior to that time. Mr. Draper has specialized in complex wage and hour litigation since October 2021. Mr. Draper has been, and currently is, co-counsel in over 40 wage and hour class action litigations for our firm and has produced excellent results for this firm's clients in wage and hour class actions.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 26, 2025 at Irvine, California.


James R. Hawkins