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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN BERNARDINO**

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,

Defendants.

Case No.: CIVSB2207118

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

**DECLARATION OF JOSEPH HICKS  
IN SUPPORT OF MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS AND PAGA ACTION  
SETTLEMENT**

Date: September 18, 2025  
Time: 8:30 a.m.  
Dept.: S22

|               |                   |
|---------------|-------------------|
| Action Filed: | April 7, 2022     |
| Removal Date: | June 10, 2022     |
| Remand Date:  | December 19, 2024 |
| Trial Date:   | None Set          |

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*Attorneys for Plaintiffs*

1 I, Joseph Hicks, declare as follows:

2 1. I am one of the named Plaintiffs in this matter. I have personal knowledge of the  
3 facts set forth herein, which are known by me to be true and correct, and if called as a witness, I  
4 could and would competently testify thereto.

5 2. I was employed by CJ Logistics America, LLC ("CJ Logistics") as an hourly  
6 employee for over three (3) years, commencing in January 2019. I am no longer employed by  
7 CJ Logistics. My rate of pay while employed by CJ Logistics America, LLC was approximately  
8 \$22 per hour. While employed by CJ Logistics, I believe I was subjected to unlawful wage and  
9 hour policies and practices. I also believed CJ Logistics' illegal wage and hour policies likewise  
10 applied to other non-exempt workers. I therefore decided to initiate a class action and  
11 representative action against CJ Logistics.

12 3. Throughout this litigation, I have understood that, as a proposed representative of  
13 the members of the class in this action, I have a fiduciary obligation to act at all times in the best  
14 interests of the members of the class. I have agreed to, accepted, and fulfilled those  
15 responsibilities throughout this litigation, and will continue to do so to the best of my ability  
16 through the entry of judgment in this matter.

17 4. I understand that being a class representative is important because I am speaking  
18 and making decisions on behalf of the other class members, and I understand it is my obligation  
19 to not place what is best for me above what is best for the class members. It is important to me  
20 that all non-exempt employees of CJ Logistics be treated fairly according to the wage and hour  
21 laws of California.

22 5. I understand that I must be honest in all activity before this Court. I have worked  
23 hard to provide complete and accurate information when asked in relation to this lawsuit, and I  
24 will continue to do that. Throughout this litigation, I have fully taken on the obligations to serve  
25 as a class representative, and I believe I have faithfully performed those duties.

26 6. To my knowledge, there are no conflicts which exist between my interests in this  
27 action and the interests of the other members of the class which would impair my ability to serve  
28 as the representative of the members of the class in this action.

1           7.       I have been very involved in this case since its inception, and I intend to continue  
2 to be involved throughout the settlement process. As a Class Representative, I have been asked  
3 to make many decisions on behalf of the class members and, on their behalf, I believe that this  
4 settlement is fair, adequate, and reasonable.

5           8.       In addition to the hours spent participating in the prosecution of this case, I  
6 accepted the potential risk of being liable for a portion of CJ Logistics' costs if we were  
7 unsuccessful in this lawsuit. I also risked the potential stigma of being a Class Representative in  
8 a Class Action labor dispute which could affect my future employability within the industry.  
9 Additionally, in signing the settlement agreement, I agreed to a general release of all claims  
10 against CJ Logistics, subject to a waiver of Civil Code § 1542

11           9.       I have not been promised, and do not expect to receive, any compensation for  
12 acting as a representative of the class other than my proportionate share of any recovery obtained  
13 for the benefit of the members of the class in this action. However, as part of the proposed  
14 settlement, the Parties have agreed to request an enhancement award for my services as one of  
15 the Named Plaintiffs and Class Representatives in the amount of Ten Thousand Dollars  
16 (\$10,000.00). I believe that my request for an enhancement award is fair and reasonable in light  
17 of the amount of work I put into this case to ensure a good result for the Class as well as the risks  
18 I took in serving as Representative Plaintiff.

19           I declare under penalty of perjury that the foregoing is true and correct under the laws of  
20 the State of California. Executed on 3/28/25 at San Bernardino California.

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22 \_\_\_\_\_  
23 Joseph Hicks  
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