

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Fletcher W. Schmidt (SBN 286462)
fschmidt@haineslawgroup.com
Matthew K. Moen (SBN 305956)
mmoen@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355
Attorneys for Plaintiffs

**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,

vs.

CJ LOGISTICS AMERICA, LLC, an Illinois
Limited Liability Company; and DOES 1
through 100, inclusive,

Defendants.

Case No. CIVSB2207118

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

**DECLARATION OF ANTONIO SEGOVIA
IN SUPPORT OF APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: April 24, 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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I, Antonio Segovia, declare as follows:

1. I am an individual over the age of 18 and one of the named plaintiffs in this matter. This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) in this case. I have personal knowledge of the facts stated in this declaration and could testify truthfully to them if called upon to do so.

2. I worked for CJ Logistics America, LLC (“Defendant”) as a non-exempt employee from approximately July 3, 2006 through approximately January 2023. Throughout my employment with Defendant, I worked as a work coordinator and forklift operator in Defendant’s San Bernardino, California warehouse.

3. During my employment, Defendant required that I complete my work duties before I take any breaks whatsoever. As a result, I regularly had to continue working for more than five hours of work before I was provided with a meal period. There were also instances when I was required to work through my meal periods, and as a result I could only take meal periods less than 30 minutes long, or I could not take my meal periods altogether. Similarly, Defendant's requirement that I complete my work duties before I take any breaks frequently prevented me from taking my rest periods. Moreover, Defendant did not compensate me with any meal or rest period premiums when it failed to provide me with meal periods and did not authorize and permit my rest periods. Further, even though Defendant paid me bonuses, including production bonuses, differential pay and production bonuses, Defendant calculated my overtime and sick pay wages based upon my base rate of pay.

4. Further, as a result of the COVID-19 pandemic, Defendant required me to undergo daily temperature checks before I could enter Defendant's facility to clock-in and begin my shift, but Defendant was not paid for all the time undergoing these temperature checks.

5. On July 15, 2022, I filed a class action lawsuit against Defendant in San Bernardino Superior Court, entitled *Antonio Segovia v. CJ Logistics America, LLC, et al.*, Case No. 2215492. I later learned that John Ledbetter had filed this action against Defendant shortly before I filed my lawsuit, which asserts overlapping claims against Defendant. Therefore, I agreed to join Defendant as a named plaintiff and dismiss my separate lawsuit in order to proceed collectively.

6. When I first filed my lawsuit, I understood that it had the chance to benefit Defendant's other workers by helping them recover money and penalties they were owed. I felt that Defendant was not following the law, and I wanted Defendant to comply with the law and treat its employees fairly. I feel that the other named plaintiffs and I have taken on a greater burden than any of the other class members because we have been actively involved in the litigation, and because it is our names that are attached to the lawsuit. Although I was aware of the risks associated with filing a public lawsuit, I chose to move forward with the case anyway. Defendant has agreed to a settlement that will benefit current and former employees of Defendant, and I believe that I should be compensated for carrying the burden of this litigation for the benefit of the other employees.

7. I have been actively involved in this case since before it was even filed. Among other things, I searched for and gathered relevant documents and provided them to my attorneys for use in the lawsuit, provided factual information to my attorneys, had various phone calls with my attorneys to discuss the claims in the lawsuit and Defendant's practices, assisted my attorneys to help them prepare for mediation, made myself available during mediation to assist my attorneys and answer factual questions posed by the mediator, reviewed and provided input regarding the settlement in this case, and otherwise assisted my attorneys in moving this case towards resolution. I estimate that I have spent approximately 15 to 20 hours in total on these activities.

I declare under penalty of perjury under the laws of the state of California and the United States that the foregoing is true and correct. Executed on 11/26/24, at Redlands, California.


Antonio Segovia (Nov 26, 2024 19:30 CST)

Antonio Segovia