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on behalf of himself and others similarly situated

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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
14 situated,

15 Plaintiffs,

16 v.

17 CJ LOGISTICS AMERICA, LLC a Delaware
Limited Liability Company; and DOES 1-50,
18 inclusive,

19 Defendants.

Case No.: CIVSB2207118

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

**DECLARATION OF ALEXANDER J.
AROESTE IN SUPPORT OF
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing Information:

Date: April 24, 2025

Time: 8:30 AM

Dept.: S22

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1 tried both labor and employment cases in State and Federal court, and has argued before various
2 Court of Appeals, on employment issues such as validity of Arbitration Agreements, Application of
3 Res Judicata in class action cases as well as other employment issues. Mr. Lavi has also been a
4 panelist and/or speaker for various Employment Law Continuing Legal Education Panels on issues
5 of employment law trials, how to proceed and conduct trials as well as proving and winning
6 punitive damages. Mr. Lavi has also been named a Southern California Super Lawyer in the area of
7 Plaintiff's employment litigation-class action from 2011-2025. Mr. Lavi has been approved as
8 class counsel by both federal and state Courts. Mr. Lavi, Mr. Granberry, myself, and the other
9 attorneys at Lavi & Ebrahimi who are available to assist us in this case if needed are fully capable
10 of adequately and fairly representing Plaintiffs and the proposed class in this matter. Lavi &
11 Ebrahimi, LLP, has been appointed Class Counsel in over fifty contested proceedings including
12 the following:

13 a. *Ischak v. Kaiser Foundation Hospitals, Inc.*, Los Angeles Superior Court
14 Case No. BC343535;

15 b. *Santana v. El Pollo Loco, Inc.*, Los Angeles Superior Court Case No.
16 BC369846;

17 c. *Edlin, et al. v. Fuddruggers, Inc.*, United States District Court, Central
18 District of California, Case No. CV-07-3678-ABC;

19 d. *Chavez, et al. vs. CEC Entertainment, Inc. d/b/a Chukee-Cheeses*, Los
20 Angeles Superior Court Case No. BC380996;

21 e. *Bustamante, et al. v. Teamone Employment Specialists*, Los Angeles Superior
22 Court Case No. BC383266;

23 f. *Cervantes, et al. v. Kaiser Foundation Hospitals, Inc.*, Alameda Superior
24 Court Case No. RG 0265835;

25 g. *Seng Savang v. Club One Casino*; Fresno Superior Court Case No.
26 05CECG02189;

27 h. *Norman, et al. v. Movado Retail Group, Inc.*, United States District Court,
28

1 Central District of California, Case No. CV08-06691 SVW (PLA);

2 i. *Shand v. G.A.L.A., Inc. dba Giorgio Armani*, Los Angeles Superior Court
3 Case No. BC342588;

4 g. *Solis v. Plycraft Industries, Inc.*, Los Angeles Superior Court Case No.
5 BC374816;

6 h. *Campos v. HWB Carwash, Inc.*, Los Angeles Superior Court Case No.
7 BC378990;

8 i. *Acosta, et al. v. Texwood Industries*, United States District Court, Central
9 District of California, Case No. CV07-3237-DDP (PLAX);

10 h. *Arevalo v. Gruma Corporation*, Los Angeles Superior Court Case No.
11 BC410322;

12 j. *Burrola v. American Promotional Events*, Los Angeles Superior Court Case
13 No. BC412315;

14 k. *Cortez v. Trader Distribution Services*, Los Angeles Superior Court Case No.
15 BC397208;

16 l. *Cueva v. Allied Industries, Inc.*, Los Angeles Superior Court Case No.
17 BC399431;

18 m. *Del Toro v. Petco Animal Supplies, Inc.*, San Diego Superior Court Case No.
19 37-2009-00103626-CU-OE-CTL;

20 n. *Garcia v. Home Cooking, Inc.*, Los Angeles Superior Court Case No.
21 BC451148;

22 o. *Alcantar v. Amerimax Building Products, Inc.*, United States District Court,
23 Central District of California, Case No. CV 10-8916 DDP (CWx);

24 p. *Arancivias v. Clougherty Packaging, LLC dba Farmer John*, Los Angeles
25 Superior Court Case No. BC432406;

26 q. *Barajas v. Menzies Aviation, Inc.*, United States District Court, Central
27 District of California, Case No CV-10-02315-JEM;

1 r. *Barrera v. BHFC Operating, LLC dba Bottega Louie*, Los Angeles Superior
2 Court Case No. BC462603;
3 s. *Camacho v. American Textile Maintenance Co.*, Los Angeles Superior
4 Court Case No. BC452570;
5 t. *Cortes v. Monsanto Company*, Ventura Superior Court Case No. 56-2010-
6 00366952-CU-OE-VTA;
7 u. *Escobar v. Aero-Electric Connector, Inc.*, Los Angeles Superior Court Case
8 No. BC421009;
9 v. *Gomez v. Bacara Resort & Spa*, Santa Barbara Superior Court Case No.
10 1341987;
11 w. *Gonzalez v. Ashley Furniture Industries, Inc.*, Los Angeles Superior Court
12 Case No. BC425708;
13 x. *Gonzalez v. Burrtec Waste Industries, Inc.*, Los Angeles Superior Court Case
14 No. BC436879;
15 y. *Gutierrez v. Visterra Credit Union*, Riverside Superior Court Case No.
16 RIC10020183;
17 z. *Hernandez v. Kruse & Son, Inc.*, Los Angeles Superior Court Case No.
18 BC411849;
19 aa. *Lopez v. Tecno Industrial Engineering*, Los Angeles Superior Court Case No.
20 BC411134;
21 bb. *Lowanga v. Continental Currency Services, Inc.*, Orange County Superior
22 Court Case No. 30-2011-0044011-CU-OE-CXC;
23 cc. *Aguilar v. PLS Financial Services, Inc.*, United States District Court, Central
24 District of California, Case No. CV 10-0415 ODW (FMOx)
25 dd. *Lozada v. Classic Party Rentals, Inc.*, Los Angeles Superior Court Case No.
26 BC443792;
27 ee. *Madrid v. OPI Products, Inc.*, Los Angeles Superior Court Case No.

1 BC451489;

2 ff. *Martinez v. J. Fletcher Creamer & Son, Inc.*, United States District Court
3 Case No. CV 10-0968-PSG-FMOX;

4 gg. *Martinez v. Administaff Companies II, L.P.*, Los Angeles Superior Court Case
5 No. BC425799;

6 hh. *Martinez v. Morgans Hotel Group Management, LLC*, Los Angeles Superior
7 Court Case No. BC446744;

8 jj. *Sanchez v. La Brea Bakery, Inc.*, Los Angeles Superior Court Case No.
9 BC456420;

10 ii. *Montenegro v. Ruggeri Marble and Granite, Inc.*, United States District
11 Court, Central District of California, Case No. CV-10-00711 JFW (PLAx);

12 kk. *Reed v. 99 Cents Only Stores*, Los Angeles Superior Court Case No.
13 BC436793;

14 ll. *Santos v. Noble Management Group-California, LLC*, United States District
15 Court, Central District of California, Case No. CV 10-2594 DSF (VBKx)

16 mm. *Taylor v. U.S. Healthworks Holding Company, Inc.*, Orange County Superior
17 Court Case No. 30-2011-00473505;

18 nn. *Valencia Diaz v. Gene Wheeler Farms, Inc.*, Los Angeles Superior Court
19 Case No. BC436235;

20 oo. *Zad-Behtooie v. Valley Village*, Los Angeles Superior Court Case No.
21 BC451490;

22 pp. *Bell v. Aidells Sausage Company, Inc.*, Alameda Superior Court Case No.
23 RG10523946;

24 qq. *Negrete v. Cenveo, Inc.*, United States District Court, Central District of
25 California, Case No. CV 11-09543 DSF (MRWx);

26 rr. *Bejar v. Exopack-Ontario, Inc.*, Orange County Superior Court Case No. 30-
27 2011-00518396-CU-OE-CXC;

1 ss. *Aguilar v. PLS Financial Services, Inc.*, United States District Court, Central
2 District of California, Case No. CV 10-0415 ODW (FMOx);

3 tt. *Sparks v. Larry Flynt dba Hustler Casino*, Los Angeles Superior Court Case
4 No. BC320172;

5 uu. *Morris v. Chevron Stations, Inc.*, Los Angeles Superior Court Case No.
6 BC361380;

7 vv. *Marino v. BP West Coast Products, LLC*, Los Angeles Superior Court Case
8 No. BC357987.

9 **CONTRIBUTION OF PLAINTIFF AND REASONABLENESS OF THE REQUESTED**

10 **ENHANCEMENT AWARD:**

11 4. It is imperative that Plaintiff William Shearer obtain just compensation for the time,
12 effort and risk associated with his fiduciary duties as a class representative and named Plaintiff. I
13 believe that the named Plaintiff performed considerable services on behalf of the Class, since he
14 searched for an attorney, collected and gathered the requested documents and information, wage
15 statements and/or pay stubs, met with us, made himself available each and every single time that we
16 called his in order to answer questions about Defendant's policies and procedures produced in
17 discovery or discussed during conversations with opposing counsel or raised in pleadings filed in
18 this matter. The named Plaintiff provided Class Counsel with factual information needed to prepare
19 the complaints. He collected relevant documents and produced those documents to Class Counsel.
20 He continued to be engaged in continued settlement negotiations that were ultimately required to
21 reach a settlement in this case. I believe that the service award request of \$5,000 to Plaintiff ("Class
22 Representative Service Payment") as a service award is fair and reasonable. As such, the requested
23 payment is warranted for his time and effort when the class members are able to receive significant
24 benefits for his efforts, as well as the fact that he put himself at significant risk for liability for costs
25 in this matter if Defendant was the prevailing party in the litigation as well as for retaliation by
26 other employers who may discover and find it to be unappealing that he was class representative in
27 a lawsuit against Defendant, his former employer. At this point in the approval process, the

1 requested service payment should be approved to allow the Class Members an opportunity to object
2 to the requested Class Representative Service Payment.

3 I declare under penalty of perjury under the laws of the State of California that the foregoing is
4 true and correct. Executed this 17th day of March 2025, at Beverly Hills, California.

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/s/ Alexander J. Aroeste
Alexander J. Aroeste

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