

Joseph Lavi, Esq. (SBN 209776)
Vincent C. Granberry, Esq. (SBN 276483)
Alexander J. Aroeste, Esq. (SBN 335653)
LAVI & EBRAHIMIAN, LLP
8889 W. Olympic Blvd., Suite 200
Beverly Hills, California 90211
Telephone: (310) 432-0000
Facsimile: (310) 432-0001
Email: jlavi@lelawfirm.com
vgranberry@lelawfirm.com
aaroeste@lelawfirm.com

Attorneys for Plaintiff WILLIAM SHEARER,
on behalf of himself and others similarly situated

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,

Plaintiff,

vs.

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

Case No.: CIVSB2207118

CLASS ACTION

*[ASSIGNED FOR ALL PURPOSES TO THE
HON. DAVID E. DRISCOLL, DEPT. S22]*

**WILLIAM SHEARER IN SUPPORT
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

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

DECLARATION OF CHRISTIAN CARRILLO

I, William Shearer, declare,

1. I am over the age of 18 and am the named Plaintiff and class representative in this matter. I have personal knowledge of the matters stated herein and if called and sworn as a witness, I would and could competently testify under oath thereto.

2. I worked for Defendant CJ Logistics America, LLC (“Defendant”), as an hourly, non-exempt employee from approximately December 14, 1992, until approximately December 28, 2023.

3. I understand this is a class action lawsuit where I represent the interests of all hourly, non-exempt employees of Defendant who worked for Defendant in California during the Class Period .

4. I have actively participated in this lawsuit by searching for an attorney since approximately January of 2023, meeting with my attorneys in this case for evaluation of my case, to retain them, and to discuss policies and practices of Defendant. I also spent time searching for policies and other documents that were given to me during my employment. I responded to all of my attorneys’ telephone inquiries and met with them to provide information about my employment and my experiences and my understanding about the operations of Defendant. During the mediation session, I made myself available and provided any information needed from me. Once the settlement agreement was finalized, I spent time reviewing and discussing the settlement agreement with my attorneys before signing it. Since I first began searching for attorneys regarding my employment with Defendant, I estimate that I have spent approximately 30 hours on this lawsuit which includes time spent searching for attorneys, searching for documents and policies to help the lawsuit, providing those documents and information to my attorneys, responding to my attorneys telephone calls and requests to meet them to provide them with more information about different aspects of my employment and experiences, speaking with my attorneys to evaluate my case and to provide information and sign documents, making myself available during the mediation session, reviewing the settlement agreements, and reviewing and providing information for this declaration.

5. I also understand that if there was a trial, I would need to be present at trial and follow any other request from the court. I have tried to support the case by responding to my attorneys when

1 I was needed and providing them with any requested information. I will continue to respond to any
2 requests from my attorneys or the court. I know that I took a risk by filing this lawsuit because, if I
3 lost, then I would have been responsible for the costs of the case. I also would have lost income if I
4 had to take work time off to come to trial or any other hearings. I also knew future employers may
5 learn of the lawsuit and view me negatively because I hired an attorney and sued my employer when
6 I thought my rights were violated.

7 6. I understand that the settlement we have reached in this case must be finally approved
8 by the Court and I must protect the interests of any and all hourly, non-exempt employees of
9 Defendant who worked for Defendant in California during the Class Period.

10 7. I do not have any interest that is adverse to the interests of the other class members.

11 8. I understand that, under the terms of the settlement agreement, the scope of my
12 release would be broader than other class members and aggrieved employees, as the Plaintiff's
13 Release provides a general release all claims and includes waiver of rights under California Civil
14 Code Section 1542.

15 8. I believe that, based on my contributions to this lawsuit, my active engagement
16 throughout this process, the risks that I have undertaken on behalf of the class, and the expanded
17 scope of my release, the \$5,000.00 amount for the Class Representative Service Award is fair and
18 reasonable.

19 I declare under penalty of perjury, under the laws of the State of California, that the foregoing
20 is true and correct.

21
22 Dated: 08/13/2025

William Shearer

William Shearer