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Attorneys for Plaintiff HECTOR J. MEJIA on
behalf of himself and others similarly situated.

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

HECTOR J. MEJIA, on behalf of himself and
all others similarly situated,

Plaintiff,

vs.

WALMART INC., a Delaware corporation;
and DOES 1 to 10, inclusive,

Defendant.

CASE NO. CIV-SB-2207614

[Assigned for all purposes to Hon. David Cohn,
Dept. S26]

CLASS ACTION

**DECLARATION OF HECTOR MEJIA IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Complaint Filed: April 12, 2022
Trial Date: None Set

1 I, HECTOR MEJIA. declare as follows:

2 1. I am over eighteen (18) years of age. The following matters are within my personal experience
3 and if called upon to testify in a court of law, I could and would testify competently thereto.

4 **MY EMPLOYMENT**

5 2. I worked for Walmart, Inc. (“Walmart” or “Defendant”) from approximately April 2020
6 through 2022 at Walmart store number 1879 in Barstow, California.

7 3. I earned approximately \$19.50 per hour working as a Team Associate.

8 4. Based on my discussions with other non-exempt, hourly employees and my supervisors, my
9 job duties were not significantly different from other employees. I was not provided with any unique
10 privileges or responsibilities. I was not subject to any unique restrictions or accommodations. I was
11 told that I was expected to follow the same rules, workplace policies, time keeping practices, and pay
12 practices as other hourly, non-exempt employees.

13 **LABOR CODE VIOLATIONS**

14 5. Throughout my time working for Defendant, I received compensation in addition to my hourly
15 wages. For example, this additional compensation was in the form of incentive pay, referral pay, and
16 cash bonuses.

17 6. The additional compensation was not included when Defendant calculated my sick pay wages.
18 As a result, I was paid sick wages at the incorrect wage.

19 7. This also caused the wage statements I received to be incorrect.

20 **MY ROLE IN THE LITIGATION**

21 8. I am not aware of any facts that would cause me to be opposed to the interests of the class I
22 seek to represent. I have not sought to secure a settlement at the expense of the absent class members.
23 Instead, I have worked with my attorneys to file a class action and represent all my former co-workers
24 to recover sick pay wages, penalties, and interest. To this end, I have assisted my attorneys by
25 providing them with information and details concerning the Defendant’s operations, locations,
26 staffing, policies, practices, and payroll information. I turned over the few documents I had in my
27 possession to my attorneys. Throughout this case, and continuing into the future, I have remained
28 ready to provide additional support when asked to do so.

1 9. I understand that the settlement agreement applies for a class representative enhancement of
2 \$10,000.00 for my services as a class representative in this case. I believe this is a fair amount given
3 the assistance that I have provided and the potential risks I faced as a plaintiff in a class action against
4 my former employer. I estimate that I have spent approximately forty (40) hours searching for
5 documents related to my employment, answering, reviewing, and verifying documents provided by
6 the Defendant, searching for documents related to my employment with Defendant, and fielding
7 numerous phone calls, emails, and letters from my attorneys.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing
9 is true and correct. Executed on 8/22/2023, at Barstow, California.

DocuSigned by:

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HECTOR MEJIA