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Attorneys for Plaintiff JESSE YELLAND, individually, and on behalf of Aggrieved Employees pursuant to the California Private Attorneys General Act

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

JESSE YELLAND, individually, and on behalf of Aggrieved Employees pursuant to the California Private Attorneys General Act,

Plaintiff,

vs.

WAYNE GOSSETT FORD, INC. dba ENCINITAS FORD; and DOES 1 through 25, inclusive,

Defendants.

Case No. 25CU012284N

Honorable Daniel Segura
Department N-28

DECLARATION OF JESSE YELLAND IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF PAGA SETTLEMENT, ATTORNEYS' FEES AND COSTS, ENHANCEMENT PAYMENT, AND SETTLEMENT ADMINISTRATION COSTS

Reservation No.:	**106265**
Date:	March 5, 2027
Time:	9:30 a.m.
Dept.:	N-28
Complaint Filed:	March 10, 2025
Trial Date:	Not Set

DECLARATION OF JESSE YELLAND

I, Jesse Yelland, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am the named plaintiff in the above-entitled action. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendant Wayne Gossett Ford, Inc. dba Encinitas Ford ("Defendant") as an hourly-paid, non-exempt Lot Attendant from approximately March 2024 to October 2024.

3. Because I thought the practices at Defendant may not be lawful, I decided to seek legal advice about my work experiences at Defendant and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps to make sure Defendant was held accountable for not properly compensating its employees for all hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits under the Private Attorneys General Act ("PAGA"), and what it meant to bring a class and PAGA action so that I understood what I was considering doing.

4. I have regularly communicated with my attorneys regarding the case and in order to fulfill my responsibilities as a PAGA representative. I have searched for and provided documents concerning my employment with Defendant, reviewed documents with my attorneys and answered their questions, provided information and guidance regarding the duties of other hourly-paid and/or non-exempt employees, and helped determine what other documents and information they could obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my current information so that they could always reach me, and to provide any additional information that I had obtained.

5. I was always available to answer any questions my attorneys had and to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could.

6. I understood that in the event this matter did not settle and proceeded with trial, I would need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any responsibilities that are necessary for this lawsuit.

7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I also understood there was a risk of losing any current job and/or income due to the time that I would have to miss work in order to fulfill my duties and responsibilities in this matter, including having to attend the trial, if needed. In contrast, the other employees who will be receiving money from this lawsuit did not have to file a claim or take the risk that I took in bringing this action.

8. I reviewed the settlement agreement, discussed the settlement agreement with my attorneys, and asked them questions before signing it. I also executed a separate agreement to settle and resolve my individual claims with Defendant.

9. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to seek relief for the Aggrieved Employees and the State of California. I have spent approximately 30-35 hours participating in this case as described above. I think my efforts helped to get the result obtained in this case.

10. I understand that any resolution of this lawsuit on a representative basis is subject to court approval. At all times throughout the course of this litigation, I have considered the interests of the Aggrieved Employees above my own personal interests.

11. I respectfully request that the Court approve and award me an Enhancement Payment in the amount of $7,500.00 for my efforts and active participation in the case. Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

12. I am not related to anyone associated with Blackstone Law, APC.

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

Executed on 09/28/2026 at Oceanside, California.

Jesse Yelland

Jesse Yelland