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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

SALVADOR RAMOS, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

WHITE LINE SYSTEMS, LLC, a Texas
Limited Liability Company, DRIVEN 2
DRIVE LEASING, LLC, a Texas Limited
Liability Company, and DOES 1 through 20,
inclusive;

Defendants.

Case No.: CIVSB2203409
*[Assigned to Hon. Jessica Morgan, Dept S26,
for all purposes]*

**DECLARATION OF PLAINTIFF
SALVADOR RAMOS IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing

Date: August 22, 2024

Time: 8:30 a.m.

Dept.: S-26

Complaint filed: 2/14/2022

I, Salvador Ramos, state and declare:

1. I am the Plaintiff in the above captioned action and have personal knowledge of
all matters stated herein and could competently testify thereto.

2. I make this declaration in support of the motion for final approval of the class
action settlement reached in this matter. As discussed herein, I believe that the settlement is fair
and reasonable and constitutes a fair resolution of the claims alleged.

3. I was employed by Defendants from approximately October 2020 to March 23,
2022. During my employment with Defendants, there were several issues that concerned me and

1 which I thought did not comply with California law, such as not being paid properly and suffering
2 other violations of California Labor Law. As a result, I retained Lauby, Mankin & Lauby LLP to
3 move forward with a case because I did not think that myself or the other employees were being
4 treated correctly.

5 4. After retaining my attorneys, I understood that I had two options: I could pursue
6 my individual case and attempt to maximize my personal recovery, or I could bring a
7 class/representative action and put the interests of the class ahead of my own. The decision of
8 whether to bring my individual claims or to bring a class action put me in a tough spot, because
9 on the one hand, I wanted to hold the company accountable for how they treated me and, on the
10 other hand, I wanted to help other employees that were not paid correctly. And I knew that, if I
11 wanted to bring a class action, I would need to put the interests of the class first to better serve
12 the class. In the end, in the interest of helping all employees that were subjected to the wage
13 violations, I decided to help everyone by bringing a class/representative action.

14 5. Since first initiating this action, I estimate that I have spent at least fifty (50) hours
15 engaged in activities to benefit the class. I have assisted my attorneys in numerous ways, including
16 helping to explain and discuss the company's practices and their general practices and procedures,
17 locating and analyzing company documents, being available during mediation, and reviewing the
18 MOU and settlement agreement. These efforts occurred through telephone conferences, letters,
19 emails, and text communications. I also assisted in preparation for mediation and helped obtain a
20 positive result for the class.

21 6. I also believe that the requested service award is fair and reasonable given that I
22 have faced substantial risks and made numerous sacrifices to obtain this class action settlement.

23 7. For example, filing this lawsuit and being a whistleblower was stressful on a day-
24 to-day basis as I have constantly worried about the risk that this could impact my ability to find
25 future jobs. I was worried that filing the case may get me labeled as a whistleblower, resulting in
26 retaliation and difficulty finding work for the rest of my career.

8. Additionally, as a condition of this settlement, I was required to compromise on and waive any separate individual claims for harassment, retaliation, and wrongful termination which other class members were not required to do.

9. I believe that request for the \$7,500 service award is justified based on (a) the time I have spent on the case, which resulted in a good settlement for the class, (b) the risks I took in bringing this case, and (c) my agreement to waive all of my individual claims in exchange for the requested service award.

10. I respectfully request that the Court approve this class action settlement. I agreed to set aside my personal interests, and to put the interests of the class ahead or on par with my own. In doing so, and by successfully bringing this case as a class action, I helped to obtain a highly beneficial settlement for the class members.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on July 25, 2024, at Upland, California.

By: 
SALVADOR RAMOS (Jul 25, 2024 15:54 PDT)