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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

JUAN CARLOS GARCIA individually, and on behalf of all others similarly situated, and on behalf of the State of California and other aggrieved persons, and SULAYMAN ABDUL AZIZ STORKS, individually, and on behalf of all others similarly situated,

Plaintiffs,

v.

CARROLL'S, LLC DBA NATIONAL TIRE WHOLESALE (NTW), a limited liability company; TBC CORPORATION, a corporation; TBC BRANDS, LLC, a limited liability company; TBC – TIRE AND BATTERY CORPORATION, a corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 25CV464606
Assigned to Hon. Elizabeth C. Peterson, Dept. 8

Complaint filed:	April 29, 2025
FAC filed:	January 14, 2026
SAC filed:	April 22, 2026
Trial date:	Not Set

CLASS & PAGA ACTION

DECLARATION OF PLAINTIFF JUAN CARLOS GARCIA IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF THE CLASS ACTION AND PAGA SETTLEMENT

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DECLARATION OF PLAINTIFF JUAN CARLOS GARCIA

I, Juan Carlos Garcia, declare as follows:

1. I am an adult resident of the State of California, and, if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief, and I believe those to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am a former employee of Carroll's, LLC dba National Tire Wholesale (NTW), TBC Corporation, TBC Brands, LLC, and TBC - Tire and Battery Corporation ("Defendants"). I worked for Defendants from approximately October 2018 to approximately December 2024 as an hourly employee. Throughout the entirety of my employment, I was subject to all of Defendant's policies and practices that have been alleged as unlawful in the Class Action Complaint and Labor Code Private Attorneys General Act of 2004 ("PAGA") Notice sent to Defendants and the Labor and Workforce Development Agency ("LWDA").

4. I initiated this lawsuit because I was concerned that Defendants owed me money due to failing to properly pay me for all the hours that I worked, and I was not provided all of my meal and rest breaks.

5. By acting as a class representative, I hoped that I might be able to change Defendants' policies to better protect the working conditions of my co-workers. I also understood that it was my duty as a class representative to represent the best interests of the class, know about the lawsuit, assist my attorneys, and keep updated on the case.

6. I have invested a lot of personal time and energy into this lawsuit. As detailed more fully below, I have spent approximately 50 hours on this case. I made it a priority to be actively involved because I wanted to do everything I could to assist my attorneys in prosecuting this case.

7. Throughout this case, I spent a lot of time on the phone with my attorneys to get

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updates about the case and provide them with information. For example, during some of the phone calls, my attorneys and I were able to identify instances when I was not paid correctly. Additionally, leading up to the mediation on January 23, 2026, I had multiple lengthy phone calls with Wilshire Law Firm, PLC regarding the claims at issue and what was to transpire at the mediation.

8. Throughout the case, I also spent time looking for documents relevant to the case to send to my attorneys. I spent numerous hours looking for these documents, including when I first contacted my attorneys, before my attorneys filed the case, and before my case was mediated. I also spent time reviewing legal documents in this case, including the retainer and settlement agreement, and discussed in detail the settlement terms with my attorneys.

9. Additionally, I made myself fully available on the day of mediation and was in continuous contact with my attorneys to assist with any questions or issues that may have arisen.

10. I believe the settlement is a good settlement and I would recommend that the Court approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad that I had the opportunity to represent the class in this lawsuit and that I was able to recover money through a settlement for the class.

11. I did not make the decision to file a class action lightly. I was concerned by the attention a publicly filed lawsuit, and especially a class action, would attract. My name would be associated with a lawsuit that I filed against my former employer. I am mindful that prospective employers might find out that I sued Defendants. Nevertheless, I felt that important rights were at stake, that Defendants' conduct hurt everyone, and that something ought to be done about it.

12. I also understand that there was financial risk in bringing this lawsuit. For example, I knew that if I did not prevail in this lawsuit, I could potentially be responsible for Defendants' attorneys' fees and costs.

13. I understand that the settlement agreement provides a service payment to me of up to $10,000.00. I believe this amount is fair compensation for my time and effort on this case, for helping to prosecute this case, and the risks with respect to my future employment. In addition, the settlement requires that I enter into a general release, which I understand is broader than the release

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that will bind other class members.

14. Based on my involvement in this case and the benefits provided to my former co-workers, I believe I helped stand up for the other workers who were too afraid to say anything to management because they did not want to risk losing their jobs or risk the stigma of suing an employer. I took on that risk because I strongly care about helping out my former co-workers.

15. I reviewed (and ultimately signed) the Class Action and PAGA Settlement Agreement in full and my attorneys answered all the questions I had. I believe the settlement terms and allocations are fair, adequate, and reasonable given the strength of the class claims and Defendants' defenses.

16. I have no conflicts of interest with any class member or the Settlement Administrator, ILYM Group, Inc.

17. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

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

Executed on 7/26/2026, at Los Banos, California.

Signed by:
C9B8D08DB67145A...
Juan Carlos Garcia

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