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Attorneys for Plaintiff and the proposed class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ALAMEDA

JEFFREY HUANG QIXIAN an individual,
on behalf of himself, others similarly situated,
and on behalf of the State of California, as a
private attorney general,

PLAINTIFF,

v.

GITIBIN & ASSOCIATES, INC., DBA GO
RENTALS; and DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. 22CV020833

[Case Assigned for All Purposes to Hon. Noel
Wise in Dept. 21]

**DECLARATION OF JEFFREY HUANG
QIXIAN IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS SETTLEMENT**

Date: October 15, 2024

Time: 1:30 PM

Dept.: 21

Reservation Number: 568901662595

Complaint Filed: October 31, 2022

Trial Date: None Set

DECLARATION OF Jeffrey Huang Qixian

I, Jeffrey Huang Qixian, state and declare as follows:

1. I am a competent adult, over the age of eighteen and the Class Representative Plaintiff in the matter of *Jeffrey Huang Qixian, an individual, on behalf of himself, others similarly situated, and on behalf of the State of California, as a private attorney general, PLAINTIFF, v. GITIBIN & ASSOCIATES, INC., DBA GO RENTALS; and DOES 1 thru 50, inclusive, DEFENDANTS*. Alameda County Superior Court Case No. 22CV020833. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto. I am making this sworn declaration in support of my claims and the claim of my co-workers, and in support of my qualifications as Class Representative. If called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I worked as a car detailer for Gitibin & Associates, Inc., dba Go Rentals (“Defendant” or “Gitibin”).

3. In my role as a car detailer, I was not paid at the proper rate for all hours worked, including overtime, I did not receive compliant meal breaks, I was not provided with accurate itemized wage statements, I did not receive proper sick pay, and was not paid all wages due at the time of separation from Defendant’s employ.

4. I have spent significant time throughout this class action working with Class Counsel. Before filing this action, in October 31, 2022, I researched and identified Counsel that I believed could best represent the interests of the Class Members. I also assisted the attorneys with investigation and gathering of information including discussing my work experience and the experience of others that I had observed while working for Gitibin and provided all relevant employment documents in my possession. In addition, I made myself available for a full-day mediation on March 13, 2024. While at the Mediation, I actively participated in the discussions with the Class Counsel and shared my knowledge and insights in order to help the Class obtain a favorable settlement.

5. Throughout the entirety of this litigation, I have maintained regular contact with Class Counsel and assisted in any way possible by providing information and making myself

1 available as needed.

2 6. I was aware that by helping to initiate this lawsuit, my name would become known
3 and it was possible that my involvement in this matter could make it more difficult for me to obtain
4 employment in this field. Regardless, I believed it was important to proceed with this matter on
5 my behalf and on behalf of all others who were subject to the same problems during their
6 employment with Gitibin.

7 7. Based upon my participation in this case, I understand the merits of this settlement
8 and I strongly support the settlement and believe it is fair and reasonable, and in the best interest
9 of the class. I believe this Settlement will benefit the Class.

10 8. It is my opinion that a fair and adequate Class enhancement for me as a Class
11 Representative is \$10,000.00. I believe that it is fair and reasonable in view of all of the work I
12 have performed in my role as a Class Representative. As Class Representative, I actively
13 participated in all stages of the litigation as detailed above and have always maintained the best
14 interest of the Class while performing my Class Representative duties.

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

17 Executed this ¹⁹ day of September, 2024 at Fremont,
18 California. (City)

Signed by:



1900D09256AC4AC
Jeffrey Huang Qixian
Declarant

(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On September 24 2024 I served all interested parties in this action the following documents described as: **DECLARATION OF JEFFREY HUANG QIXIAN IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

David L. Cheng
dcheng@fordharrison.com
Min K. Kim
mkim@fordharrison.com
FORD & HARRISON LLP
350 S. Grand Avenue, Suite 2300
Los Angeles, CA 90071

Emil Davtyan
emil@d.law
D.LAW, INC.
400 N. Brand Blvd, 7th Floor
Glendale, CA 91203

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION): I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 24, 2024 at Encino, California.



Michelle Tanzer