

Arby Aiwazian (SBN 269827)
Vartan Madoyan (SBN 279015)
Stephanie Roseman (SBN 364057)
LAWYERS for JUSTICE, PC
450 North Brand Boulevard, Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021
Attorneys for Plaintiffs David Reese, Isaac Kharaud, and Patricia Brown

James R. Hawkins, Esq. (#192925)
Gregory Mauro, Esq. (#222239)
JAMES HAWKINS APLC
9880 Research Drive, Suite 200
Irvine, CA 92618
Tel.: (949) 387-7200 / Fax: (949) 387-6676
Attorneys for Plaintiff Victor Diaz

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

DAVID REESE, ISAAC KHARAUD,
PATRICIA BROWN, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the California
Private Attorneys General Act;

Plaintiffs,

vs.

VEOLIA TRANSPORTATION, an unknown
business entity; TRANSDEV SERVICES,
INC., a Maryland corporation; and DOES 1
through 100, inclusive,

Defendants.

VICTOR DIAZ, individually and on behalf of
all others similarly situated,
Plaintiff,

vs.

TRANSDEV NORTH AMERICA, INC., a
California Corporation and DOES 1-50,
Inclusive.

Case No.: 21STCV29413 (lead)
[Related to Case Nos. 21STCV36076;
22STCV32496; 22STCV38405; and
23AHCV02160]

Honorable Carolyn B. Kuhl
Department 12

**DECLARATION OF PLAINTIFF VICTOR
DIAZ IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PAGA SETTLEMENT**

DECLARATION OF VICTOR DIAZ

I, VICTOR DIAZ hereby declare as follows:

1. I am over the age of eighteen and I submit this Declaration in support of the Plaintiff's Motion for Preliminary Approval of Class Action Settlement. The following is based upon my personal knowledge and if called as a witness, I could and would competently testify thereto.

2. I was employed by Defendant TRANSDEV NORTH AMERICA, INC., ("Defendant") in March 2020 as a Non-Exempt Employee with the title of Parts Purchaser and worked during the liability period for Defendant until my separation from Defendant's employ in approximately November 2021.

3. As a non-exempt employee, I suffered the same damages as other employees. These included not provided accurate wage statements, not provided with meal or rest periods, not paid timely during my employment, not properly paid overtime, not paid through labor code compliant instruments, and not timely paid wages upon my separation from Defendant's employ. As a result of these alleged violations, I sought consultation with my attorneys at James Hawkins, APLC.

4. Based upon my allegations, and after consultation and full disclosure from my attorneys about the potential risks I faced as a Plaintiff in a putative class action, I freely decided to pursue this lawsuit to try and vindicate my rights and the rights of others who also worked for Defendant and suffered similar harms due to Defendant's common practices and policies.

5. Prior to filing my action, my attorneys and I had multiple conferences about the factual bases for the claims that I wanted to pursue against Defendant. During those conferences, my attorneys provided me with an overview of how those claims would be litigated and generally educated me about the nature of complex/representative litigation and my role as a representative Plaintiff.

6. My attorneys provided me with a draft of the complaint for my review and approval. I closely reviewed the complaint to ensure accuracy and completeness. As a

1
2 result, I caused my attorneys to file the class action complaint alleging claims for the allegations
3 alleged therein. Thereafter, I have been fully involved in my case. Following the filing of the
4 complaint, I collaborated with my attorneys on the prosecution of my claims, and I regularly
5 contacted my attorneys to stay current on the status of the litigation, and to discuss my
6 attorneys' progress in prosecuting the claims.

7 7. Since I believe I was not provided accurate wage statements, not provided with
8 meal or rest periods, not paid timely during my employment, not properly paid overtime, not
9 paid through labor code compliant instruments, and not timely paid wages upon my separation
10 from Defendant's employ, I believe that I have been similarly injured as to all other class
11 members in the settlement who worked for Defendant during the class period. I believe the
12 claims asserted in the Complaint are also shared by the other Class Members. I worked with
13 various other non-exempt employees, and I believe we were all treated the same and subject to
14 the same unlawful policies.

15 8. On October 4, 2022, I, through my attorneys, filed the action entitled *VICTOR*
16 *DIAZ v. TRANSDEV NORTH AMERICA, INC.*, Los Angeles County Superior Court Case No.
17 23STCV09374 against Defendant for Defendant's alleged: (a) failure to pay minimum and
18 overtime wages, (b) failure to provide meal periods, (c) failure to provide rest periods, (d)
19 failure to pay all wages earned and owed upon separation from Defendant's employ, (e) failure
20 to pay wages timely during employment, (f) failure to provide accurate itemized wage
21 statements, (g) failure to issue payment of wages in the form of a Labor Code-compliant
22 instrument and (h) violation of Business & Professions Code section 17200, et seq.¹

23 9. On October 4, 2022, I, through my attorneys, submitted a notice with the Labor
24 & Workforce Development Agency ("LWDA") alleging that Defendant violated Labor Code
25 sections 201-204, 212-213, 226, 510, 512, 558, 226.3, 1174, 1174.5, 1175, 1194, 1197, 1197.1,
26 1198, pursuant to Labor Code section 2699. My PAGA complaint was subsequently filed on
27 December 9, 2022.²

28 ¹ A first amended class complaint was filed on February 20, 2024

² A first amended PAGA complaint was filed on February 20, 2024.

10. Since I agreed to become a Class Representative, I have worked every step of the way with my attorneys. During the course of the litigation, I have always kept the best interest of the Class Members on equal footing as mine. I have been, and I am willing to continue to pursue the Class Members' claims vigorously on our collective behalf if the Settlement is not finally approved. As a result, I firmly believe that I do not have any interests adverse to the interests of the Class Members. I have maintained the Class Members best interest from the inception of the case.

11. As a Class Representative, I have spent numerous hours consulting with my attorneys, providing documentation, consulting with other Class Members, responding to questions by my attorneys, providing documents to my attorneys, working with my attorneys to review documents received, helping my attorneys in preparing for the mediation and attending the mediation via telephone. I was consulted about the status of the case and provided constant feedback about the case from my attorneys including the mediation, settlement negotiations and eventual settlement. I estimate I have spent approximately 41 hours working on this case.

12. From the beginning of this case, I have freely chosen to accept the risks of being a Class Representative in this class action lawsuit. I chose to assume these risks and pursue the claims on behalf of the Class Members as I wanted to vindicate their rights. I believe we have achieved that result with the settlement and the individual payments to the Class Members. I believe the settlement is fair reasonable and adequate based on the numerous defenses asserted by Defendant. I believe the efforts and work I put forth helped to achieve the fair settlement that will benefit the Class Members. As a result of my efforts, I also believe the Enhancement Award is reasonable, and I respectfully request the Court approve the amount of \$10,000.00 to each Plaintiff as fair and reasonable.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct. Executed on June 17, 2026, at Lancaster, California.

Signed by:

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VICTOR DIAZ