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Attorneys for Plaintiffs, Salomon Garcia and
Luis Miguel Guizar

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

SALOMON GARCIA and LUIS MIGUEL
GUIZAR, individually, and on behalf of other
members of the general public similarly situated,

Plaintiffs,

vs.

ATLAS FREIGHT FORWARDING, INC., a
California Corporation; and DOES 1 through 25,
inclusive,

Defendant.

Case No. 37-2022-00039724-CU-OE-CTL
[related to case no. 37-2023-00002842-CU-WT-CTL]

Honorable Mark T. Cumba
Department C-65

**DECLARATION OF SALOMON GARCIA IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT**

Date: December 12, 2025
Time: 8:30 a.m.
Dept: C-65

Complaint Filed: October 4, 2022
FAC Filed: December 8, 2022
Trial Date: Not Set

DECLARATION OF SALOMON GARCIA

I, Salomon Garcia, declare and state as follows:

1. I am over the age of eighteen (18) and I am a resident of the State of California. 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 am one of the named plaintiffs in this action.

3. I was employed by Defendant Atlas Freight Forwarding, Inc. ("Defendant") as a forklift driver from approximately November 2021 to approximately June 2023. I was always an hourly-paid, non-exempt employee during my employment with Defendant.

4. During my employment, I questioned whether Defendant was paying its employees correctly and I believed that I and other employees were not being allowed to take meal and rest breaks lawfully, among other things. I decided to seek legal advice about my experience working for Defendant and to obtain information about filing a lawsuit to redress these grievances.

5. I contacted Blackstone Law, APC and spoke with attorneys there. I wanted to take steps to make sure Defendant was held accountable for not properly compensating its employees for all hours worked, not providing employees with lawful meal and rest breaks, not reimbursing employees for business expenses, and other related violations. After speaking with the attorneys, I educated myself on representative action lawsuits to gain a better understanding of them. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my experiences and what it meant to bring a class action lawsuit, and an action under the California Labor Code Private Attorneys General Act of 2004 ("PAGA").

6. I have regularly communicated with my attorneys regarding the case, and in order to fulfil my responsibilities as a class and 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, non-exempt employees, and helped determine what other documents and information my attorneys 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

1 provide any additional information that I had obtained.

2 7. I was always available to answer any questions my attorneys had and to speak and meet
3 with my attorneys whenever they needed me. I responded to them as quickly as possible and gave
4 them as much information as I could. I described Defendant's policies, practices, and procedures. I
5 also contacted and referred potential witnesses to my attorneys, and helped my attorneys prepare for
6 and participate in mediation.

7 8. I reviewed the settlement agreement and discussed it with my attorneys before I signed
8 it.

9 9. I also understood that if this matter had proceeded to trial, I would need to come to
10 court and participate in the trial. I was prepared to do that.

11 10. I am aware that I took a risk by filing this lawsuit because if we lost, I could potentially
12 have to pay the costs incurred in the lawsuit. I also risked losing income for the time that I would have
13 to spend fulfilling my ongoing responsibilities including having to attend the trial. I also believe I have
14 taken a risk by filing this lawsuit because potential future employers can find out that I sued my
15 employer, and that may negatively impact my ability to be hired for a job in the future. In contrast, the
16 other employees who will be receiving money from this lawsuit did not have to file any claim or
17 lawsuit, or take the risks that I took in bringing this action.

18 11. I believe that I have done everything that my attorneys have asked of me and tried, to
19 the best of my ability, to seek relief for the class members, aggrieved employees, and the State of
20 California. I think my efforts helped to get the result obtained in this case.

21 12. I understand that any resolution of this lawsuit on a class and/or representative basis is
22 subject to court approval. I have at all times throughout the course of this litigation, considered the
23 interests of the other class members and aggrieved employees above my own personal interests.

24 13. To date, I estimate I have spent approximately 30 to 35 hours on this case. I have
25 worked to assist my attorneys in this matter for over a year, as the Defendant has actively fought this
26 case.

27 14. I respectfully request that the Court approve and award me the requested service award
28 in the amount of \$5,000.00 for my efforts and active participation in the case and for my broader,

1 general release of all claims that I have or may have had against Defendant. Taking into consideration
2 the general release I am giving and the time and effort that I have dedicated to this case, I believe that
3 this amount is reasonable.

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

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

7 Executed on 07/24/2024 at San Diego, California

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