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Attorneys for Plaintiff, JEREMIAH CLAIBORNE
on behalf of himself and all others similarly situated

[Additional Counsel Listed on Next Page]

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

JEREMIAH CLAIBORNE, PABLO CAMPOS
HERNANDEZ and MARCOS RODRIGUEZ
and VICTOR AVALOS on behalf of
themselves and all others similarly situated

Plaintiffs,

vs.

PERFORMANCE TRANSPORTATION, LLC,
a California limited liability company;
PERFORMANCE FOOD GROUP, INC., a
Colorado corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 22STCV31766

ASSIGNED FOR ALL PURPOSES TO:
JUDGE: Hon. David S. Cunningham III
DEPT: S11

**DECLARATION OF RUBEN
ESCOBEDO IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND PAGA
SETTLEMENT**

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20 Attorneys for Plaintiffs MARCOS RODRIGUEZ
21 And VICTOR AVALOS
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I, RUBEN ESCOBEDO, declare as follows:

2. I have personal knowledge of the matters set forth herein and would and could testify thereto if called as a witness herein.

4. I attended law school at Chapman University School of Law (Fowler), and graduated cum laude in 2011. My law school training included time at Raytheon Space and Airborne Systems' legal department, where I assisted with unique transactional matters alongside former JAG attorneys. I participated in moot court and served as a teaching assistant. My paper, *Achieving the Goals of Sentencing Tax Evaders After United States v. Booker*, Vol. 2 Chapman Journal of Criminal Justice 275 (2011), was published in the Chapman Journal of Criminal Justice, where I was a member. I passed the California Bar Examination and obtained my law license in 2011.

6. From 2010-2013, during and after law school, I joined a small firm. My first formal law firm training was provided by Mohammed K. Ghods, who was previously a shareholder in the national law firm of Ross, Dixon & Bell, LLP before that firm's merger with

1 Troutman Sanders (now Troutman Pepper). I handled various business and employment matters
2 for the firm's clients.

3 7. From 2013-2020, I was a partner at the law firm of Lynberg & Watkins, where I
4 primarily defended private businesses in employment litigation and municipalities in
5 employment & personal injury litigation from 2013 to 2020. I have litigated across the state,
6 including Orange County, Riverside County, Los Angeles, San Diego County, San Bernardino
7 County, Santa Barbara County, Kern County, Merced County, Tulare County, San Luis Obispo
8 County, Contra Costa County, Alameda County, Placer County, Santa Clara County, San
9 Francisco, Sacramento County, and San Joaquin County. I have tried cases successfully to
10 verdict, both as lead counsel and second chair. I have represented both employees and
11 employers at various times during my career.

12 8. I have successfully litigated employment cases in many industries, including
13 Agriculture, Construction & Maintenance, Food Service, Education, Healthcare, Hotel &
14 Hospitality, Janitorial, Manufacturing, Public Safety, Professional Occupations, Retail,
15 Technology / IT, and Transportation & Distribution. In 2020, transitioned to a solo practice
16 where I continue my work primarily in private sector employment litigation on behalf of
17 employees.

18 9. I am licensed to practice before the U.S. Court of Appeals for the Ninth Circuit
19 and the U.S. District Courts for the Central, Eastern, Southern, and Northern Districts of
20 California.

21 10. I am a member of the American Society of Legal Writers, National Order of
22 Scribes, Northern Santa Barbara County Bar Association, and San Luis Obispo County Bar
23 Association. I have also been awarded the Rutan & Tucker, LLP Golden Quill Legal Writing
24 Award. I have spoken at conferences and MCLE events on various topics, including
25 employment law and anti-SLAPP motions. I served as the Employee Co-Chair of the ABA
26 Workplace & Occupational Safety and Health Law Committee for the period of 2024-2025.

27 11. I have served as counsel either for the prosecution or defense in connection with
28 approximately 100 class and representative PAGA actions throughout my career.

1 12. I have reviewed the Joint Stipulation for Settlement and Release of Class Action
2 and Representative Action Claims and respectfully request that this Court approve the same for
3 the reasons set forth in the Motion for Preliminary Approval of Class Action Settlement, which I
4 have reviewed and incorporate herein as true and correct.

5 13. Throughout this action, I have been responsible for the prosecution and
6 investigation of the claims of Plaintiff against Defendant. I have performed an appropriate
7 amount of work performed in this action. I conducted legal research, investigation, and analysis
8 of each potential cause of action and claim in Plaintiff's case. I have assessed the strengths and
9 weaknesses of the claims pled and defenses available in this case and the benefits of the
10 proposed Settlement under the circumstances of the case, and have reached the informed
11 conclusion that the Settlement is fair, reasonable, and adequate and is in the best interest of the
12 Class Representatives and the Class Members.

13 14. I have committed and continue to commit significant financial and staffing
14 resources to the representation of Plaintiff.

15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct. Executed this 20th day of December 2024.
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20 By:



RUBEN ESCOBEDO
Declarant