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Attorneys for Defendants
KAL FREIGHT INC., SPG TRANSPORTATION INC.,
and PRO TEC INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE

JANE DOE, individually, on a representative
basis, and on behalf of all others similarly
situated;

Plaintiff,

vs.

KAL FREIGHT, INC., a Texas Corporation;
SPG TRANSPORTATION INC., a California
Corporation; PRO TEC INC., a California
Corporation; and DOES 1 through 20,
inclusive;

Defendants.

Case No.: CVRI2204960

[Assigned for all purposes to:
Judge: Hon. Harold W. Hopp, Dept. 1]

**DECLARATION OF REKHA BALAN, IN
SUPPORT OF PLAINTIFFS' UNOPPOSED
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION AND PAGA
SETTLEMENT**

Hearing

Date: December 4, 2024

Time: 8:30 a.m.

Dept.: 1

Complaint filed: November 14, 2022

Trial Date: None Set

DECLARATION OF REKHA BALAN

I, REKHA BALAN, declare and state as follows:

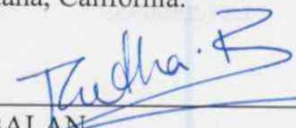
1. I am over 18 years old and duly competent to testify in this matter. I make this Declaration in support of the Motion For Preliminary Approval Of Class Action And PAGA Settlement in the pending matter of *Jane Doe v. KAL Freight, Inc., et al.*, Riverside County Superior Court Case No. CVRI2204960, and to comply with paragraph and **G(3)(k)(ii)** of the current Case Management Order (“CMO”) governing this case. The facts contained herein are true based on my personal knowledge, and if called upon as a witness in this case, I could and would testify competently to the truth thereof.

2. I am currently employed by Defendant KAL Freight, Inc. as an HR Director. I have held this position since July 7, 2021. In my role as the HR Director, I have personal knowledge of and access to business records, truck driver files of Class Members, truck driver records for of Class Members, which are maintained by Defendants KAL Freight, Inc., SPG Transportation Inc., and Pro Tec Inc. (collectively, “Defendants”) since KAL Freight, Inc., SPG Transportation Inc., and Pro Tec Inc. have an Intercompany Services Agreement.

3. **CMO Section G(3)(k)(ii)**: Based on my personal knowledge, the typical Class Member in this action is over the age of 18, and all commercial drivers have workable knowledge of English Language as required by law.

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

Executed this 21st day of August, 2024, at Fontana, California.



REKHA BALAN