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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

TIANA WILLIAMSON and HARPREET
AUJLA, individually, on a representative
basis, and on behalf of all others similarly
situated;

Plaintiffs,

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 to Hon. Harold W. Hopp, Dept 1,
for all purposes]*

**DECLARATION OF PLAINTIFF
TIANA WILLIAMSON**

I, Tiana Williamson, state and declare:

1. I am the Plaintiff in the above captioned action and have personal knowledge of all matters stated herein and could competently testify thereto. I make this declaration in support of the motion for preliminary approval of the class action settlement. I believe that the settlement is fair and reasonable and constitutes a fair resolution of the claims alleged.

2. When I first retained my attorneys (Lauby, Mankin & Lauby) and chose to pursue this case on a class action basis, I understood that I had specific burdens as the “Class

Representative,” which included: (a) representing the interests of all class members, (2) considering the interests of all class members above my own personal interests, (3) participating actively in the lawsuit, including potential testimony at deposition and trial, and keeping generally aware of the status and progress of the lawsuit. Moreover, I understood that any resolution of the lawsuit is subject to court approval and must be designed in the best interests of the class as a whole.

3. Since first initiating this action on behalf of the proposed class, I believe that I have more than adequately performed my duties as a class representative. I have been an active participant in this litigation, including assisting my attorneys in various ways and making myself available when needed. For example, I have assisted my attorneys by compiling and analyzing substantial documentation regarding the claims in this case. I have also helped to explain and discuss the company’s practices and their general practices and procedures, locating and analyzing company documents, among others. I have also reviewed all settlement documents and believe that this settlement is fair for the class. Finally, I will continue to take all steps necessary to finalize this settlement and obtain court approval.

4. Additionally, I believe that my claims are typical of the other employees (the class members) because we were all subjected to the same practices of the company in regard to the misclassification as independent contractors, the payment of wages, along with other issues.

5. I have no conflicts with the proposed class members and will continue to assist with the litigation and prosecute the case on behalf of the other employees.

6. I respectfully request that the court preliminarily approve the service award. As outlined above, I have performed substantial services for the Class and helped obtain a highly beneficial settlement for my fellow employees. At the final approval stage, I will submit an additional declaration setting forth all the work I did for this case, including an estimated number of hours spent assisting the Class and my attorneys.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on Sep 6, 2024, at Victorville, California.

By:


Tiana Williamson (Sep 6, 2024 08:44 PDT)
Tiana Williamson