

JAMES HAWKINS APLC

James R. Hawkins, Esq. (#192925)
Gregory Mauro, Esq. (#222239)
Michael Calvo, Esq. (#314986)
9880 Research Drive, Suite 200
Irvine, CA 92618
Tel.: (949) 387-7200
Fax: (949) 387-6676
Email: James@jameshawkinsaplc.com
Email: Greg@jameshawkinsaplc.com
Email: Michael@jameshawkinsaplc.com

FALAKASSA LAW, P.C.

Joshua S. Falakassa, Esq. (Bar No. 295045)
josh@falakassalaw.com
1901 Avenue of the Stars, Suite 450
Los Angeles, California 90067
Tel: (818) 456-6168; Fax: (888) 505-0868

BOKHOUR LAW GROUP, P.C.

Mehrdad Bokhour, Esq. (Bar No. 285256)
mehrdad@bokhourlaw.com
1901 Avenue of the Stars, Suite 450
Los Angeles, California 90067
Tel: (310) 975-1493; Fax: (310) 675-0861

Attorneys for Plaintiffs and the Putative Classes

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

QUINCY GRIFFIN PERKINS, JOSE
JOHNSON, IGNACIO PARKS, AND
TIWAN JOHNSON, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

HADCO METAL TRADING SANTA FE
SPRINGS CA dba RYDER
INTEGRATED
LOGISTICS INC.: and DOES 1-50,
inclusive,

Defendants.

Lead Case No. 3:23-cv-00502-WHO
[Consolidated for all purposes with Case
No. 3:23-cv-01694-WHO & Case No.
4:22-cv-07456-JST]

[Assigned to the Honorable William H.
Orrick]

FRCP RULE 23 CLASS ACTION

**DECLARATION OF TIWAN
JOHNSON IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

DECLARATION OF TIWAN JOHNSON

I, Tiwan Johnson, hereby declare:

1. The facts set forth herein are true to my own personal knowledge, and if called upon to testify thereto, I could and would competently do so under oath.

2. I am one of the named plaintiffs in this action.

3. On or around October 17, 2022, the Class Action Complaint entitled *Jose Johnson, et al. v. Hadco Metal Trading Santa Fe Springs CA dba Ryder Integrated Logistics Inc.*, Case No. 22CV019819 was filed in the Superior Court of California, Alameda County, on behalf of myself, and all other current and former similarly situated non-exempt hourly employees in California.

4. On or about November 23, 2022, the case was removed to Federal Court, Northern District of California, Case No. 3:22-cv-07456-AGT, later consolidated with Case No. 3:23-cv-00502-WHO.

5. I was added as a Plaintiff to the above-entitled case on or about May 2023.

6. I was employed by defendant Hadco Metal Trading Santa Fe Springs CA dba Ryder Integrated Logistics Inc. ("Defendant") as a non-exempt hourly employee from in or around December 2021 to approximately April 7, 2023. I and other employees (including, but not limited to, material handlers, loading, unloading, picking, staging, and all other non-exempt positions) were responsible for all aspects of Defendant's business in California. I was subjected to the same employment policies and practices that affected other similarly situated employees of Defendant in California during the relevant time period.

7. As a non-exempt employee employed by Defendant, I was not paid minimum wage, I was not reimbursed for all business expenditures, I was also not issued accurate itemized wage statements and did not receive all of my wages due upon separation of my employment.

8. I understand that, as a Class Representative, I have a duty to look out for and protect the interest of the class members as a whole. I do not believe, nor do I have

1 any reason to believe, that my interests in this lawsuit are in conflict or in any way
2 antagonistic to the interests of those of my fellow similarly situated employees. Given
3 the various defenses asserted by Defendant, I believe, along with my attorneys, that the
4 settlement obtained is fair and reasonable to the putative class members.

5 9. As the named Plaintiff in this action, I provided invaluable assistance to
6 my attorneys and the putative class members in this case, including providing factual
7 information, wage and hour documentation, wage statements, my payroll records and
8 personnel file and factual background for the allegations in the Complaint. I also spent
9 numerous hours preparing for and was available on the day of mediation. I also
10 participated in various phone calls with my lawyers to discuss litigation and settlement
11 strategy and reviewed the settlement documents. My efforts were instrumental in
12 securing the favorable terms of the Settlement Agreement, which will provide
13 monetary compensation to the similarly aggrieved employees of Defendant. I also
14 agreed to participate in this case with no guarantee of personal benefit.

15 10. This case also involved risks for me, such as the potential risk of having
16 to pay Defendant's costs if we lost. Disregarding these risks, I pursued this case on
17 behalf of the aggrieved employees and the State of California to a successful resolution
18 and settlement. Further, as part of the Settlement, I am also agreeing to a general release
19 of all claims, which is broader than the release of claims that the members of the class
20 will agree to if they wish to participate in the settlement.

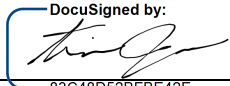
21 11. I have not received and will not receive any benefits in connection with
22 this action other than my portion of the general settlement and requested service award.

23 12. It is my understanding that based upon my industrious efforts as the
24 named Plaintiff in this action, I may be entitled to a Service Award. I respectfully
25 request that the Court grant this award to me in the amount of \$15,000 in addition to
26 my pro rata share of the settlement fund.

27 13. In light of what I have done for the class and the hard work I put in, I
28 believe that the requested award is fully warranted and respectfully request that it be

1 granted. Moreover, I voluntarily undertook a great amount of risk by publishing my
2 name and putting my time and reputation on the line to represent the putative class
3 members. Regardless of these risks, I put the interests of the class before mine.

4 I declare under penalty of perjury under the laws of the United States and the
5 State of California that the foregoing is true and correct this 4/10/2024 in
6 San Bernardino County, California.

DocuSigned by:

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Plaintiff Tiwan Johnson