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Attorneys for Plaintiffs, the Class, and Aggrieved Employees

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

GILBERT PARAMO and ROSEMARIE
SANTOS, as individuals and on behalf of
all others similarly situated,

Plaintiffs,

vs.

WEEE LOGISTICS INC., a Delaware
corporation; WEEE! INC., a Delaware
corporation; WEEE! LOGISTICS LLC, a
Delaware limited liability company; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: STK-CV-UOE-2023-0001129

**DECLARATION OF ROSEMARIE SANTOS
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: October 25, 26 or November 7, 8, 10, 2023

Time: 9:00 a.m.

Dept.: 10C

Complaint Filed: February 9, 2023

Trial Date: Not Set

DECLARATION OF ROSEMARIE SANTOS

I, Rosemarie Santos, declare as follows:

1. I am an individual over the age of 18 years old and am a resident of California. I am the named Plaintiff in this matter. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I worked for Defendants Weee! Logistics Inc, and Weee! Inc. ("Defendants") as a cherry picker from in or about December 2020, until on or about January 26, 2021. Throughout my employment with Defendants, I was an hourly, non-exempt employee.

3. During my employment with Defendants, I routinely performed work off-the-clock without compensation for minimum, regular, and overtime wages. Among other things, I was required to undergo COVID-related protocols off-the-clock, which included undergoing temperature checks before clocking into my work shifts, and after clocking out of my work shifts. Additionally, I was required to perform off-the-clock work tasks, including attending meetings and performing various pre- and post-shift tasks. I was not paid any wages for the time spent in connection with such off-the-clock work. I was also underpaid overtime wages.

4. During my employment with Defendants, I was also not provided with off-duty meal and rest periods. In this regard, I had to remain on-call and perform work during meal and rest periods. In addition, I was not paid meal and/or rest period premiums at the regular rate of pay.

5. Additionally, during my employment with Defendants, I was not paid reimbursement for business-related expenses. Specifically, I was required to use my personal cell phones for work-related purposes each work shift, including to download a mobile application—WEEE, for work purposes. I was not paid any reimbursement for business-related expenses incurred, including charges related to personal cell phone use for work-related purposes.

6. Lastly, during my employment with Defendants, I was not provided with accurate wage statements that displayed correct information pertaining to my pay.

13 9. I have discussed the case with my attorneys on a number of occasions, provided
14 information and documents to my attorneys to help with the prosecution of the case, and
15 reviewed documents in the case, including the Settlement Agreement.

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

DocuSigned by:
Rosemarie Santos
FD1D418FEA834C2... Rosemarie Santos