

Larry W. Lee (State Bar No. 228175)  
Max W. Gavron (State Bar No. 291697)  
Kwanporn “Mai” Tulyathan (State Bar No. 316704)  
**DIVERSITY LAW GROUP, P.C.**  
515 S. Figueroa Street, Suite 1250  
Los Angeles, CA 90071  
(213) 488-6555  
(213) 488-6554 facsimile  
lwlee@diversitylaw.com  
mgavron@diversitylaw.com  
ktulyathan@diversitylaw.com

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

(Assigned to the Honorable Jayne Lee, Dept.  
10C)

**DECLARATION OF ROSEMARIE SANTOS  
IN SUPPORT OF PLAINTIFFS’ MOTION  
FOR FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT**

Date: December 6, 2024  
Time: 9:00 a.m.  
Dept.: 10C

Complaint Filed: February 9, 2023  
FAC Filed: August 1, 2023  
Trial Date: None 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.

7. Throughout this litigation, I have spent a significant amount of time discussing

1 this matter with my attorneys on many occasions and explaining Defendants' practices. I have  
2 conferred with my attorneys to discuss this case and the facts involved. I also conferred with my  
3 attorneys to respond to questions and to provide documents. During the course of this litigation,  
4 I have made myself available to answer questions my lawyers may have and review documents  
5 as necessary.

6 8. I understand that this action was brought on behalf of all other employees in the  
7 State of California, and that I am acting as one of the representatives for the Class. As the Class  
8 Representative, I understand that it is my responsibility to act in the best interests of the Class  
9 and not my own. I agree that I will not put my own interests ahead of those of the Class, and that  
10 I will not settle out my class claims in this lawsuit separately or independently from the Class.  
11 Moreover, I am not aware of any conflicts that exist between my interests and the interests of the  
12 Class that would impair or affect my ability to serve as representative for the Class.

13 9. I have and continue to be willing to assist in the investigation of this matter,  
14 including gathering and providing any necessary information and documents, making myself  
15 available for trial or any further proceedings in this matter as required to represent the interests of  
16 the Class. I also understand my duties and responsibilities to the proposed Class and will carry  
17 out those duties as necessary. Thus far I have spent approximately 35 hours on this matter, which  
18 includes discussing this case and the facts involved with my attorneys and participating in  
19 telephonic meetings with my attorneys at various stages of the lawsuit; searching for and  
20 providing documents pertaining to the case; reviewing the files and pleadings, including my  
21 employment records, PAGA letter, complaint, and Settlement Agreement; responding to any  
22 questions from my attorneys regarding Defendants' practices; regularly providing information to  
23 my attorneys; and remain available during mediation.

24 10. I have discussed the terms of the Settlement Agreement with my attorneys, and  
25 based on the information provided, I believe the Settlement to be fair, adequate, and reasonable  
26 for myself and for the entire Class.

27 11. I am proud of the result and accomplishment of this lawsuit. I feel that it is a  
28 positive accomplishment of this lawsuit. I understand that many individuals will benefit in this

lawsuit because of the actions that I have taken.

12. I am aware and have been aware from the start of the case, that there is the risk that if I do not win my case, then I could be liable for Defendants' litigation costs. I accepted that risk in this case.

13. I understood that filing this lawsuit is a public record. Further, I understood that, because this lawsuit is a public record, it could and can adversely affect my ability to obtain employment.

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

Executed on this <sup>5</sup> day of November 2024, at san bernardino, California.

DocuSigned by:  
  
FD1D448FEA834C2  
 Rosemarie Santos