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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 GILBERT PARAMO 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 GILBERT PARAMO

I, Gilbert Paramo, 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 as a picker/stockroom worker from in or about December 2020, until in or about January 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.

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

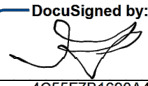
8 8. I have and continue to be willing to assist in the investigation of this matter,
9 including meeting, conferring, discussing the case with my attorneys, gathering and providing
10 any necessary information and documents, making myself available for trial or any further
11 proceedings in this matter as required to represent the interests of the Class. I also understand
12 my duties and responsibilities to the proposed Class and will carry out those duties as necessary.

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.

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

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

21 Executed on this ¹⁴ day of July, 2023, at Riverside, California.

22
23 DocuSigned by:
24 
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26 Gilbert Paramo
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