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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

LUTOVIO J. IULIANO, ROBERT WINIECKI,
and TERRY SNIPES individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

WORLDWIDE FLIGHT SERVICES, INC., a
Delaware Corporation; WFS EXPRESS, INC., a
Delaware Corporation and DOES 1 TO 50,
inclusive

Defendants.

Case Number: 34-2023-00337627

**Declaration of Robert Winiecki in Support of
Plaintiff's Motion for Preliminary Approval
of Class Action Settlement**

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DECLARATION OF ROBERT WINIECKI

I, Robert Winiecki, declare as follows:

1. I am an adult over eighteen years old and unless context indicates otherwise, I have personal knowledge of the following facts and if called as a witness, I could and would testify competently to them.

2. I am the named plaintiff and proposed class representative in the above-captioned action. I make this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (the "Motion").

3. I was employed by Defendant WFS Express, Inc. ("Defendants") during the applicable statutory period. I brought this action to redress certain employment claims that my co-workers and I had against Defendants. During my employment with Defendants, I was not paid all overtime wages owed, provided meal periods and rest periods, provided with timely payment of wages after employment, provided with timely payments during employment, nor provided accurate wage statements.

4. I was subject to the same uniform policies and procedures that were alleged in the operative complaint and discussed in the Motion. I believe I was underpaid as a result of Defendant's implementation of those policies and practices. I do not believe any of the alleged conduct to be unique to me. To the contrary, it is my understanding that all of the alleged conduct was experienced by other employees as a result of Defendant's uniform policies and procedures, and I witnessed most, if not all, employees with whom I had contact with be subjected to the same conduct as a result of Defendant's same uniform policies and procedures. For these reasons I believe my claims to be typical of the claims of the other class members.

5. By filing my case, I agreed to pursue not only my individual employment claims, but the claims of all similarly situated employees, and if necessary, to put the interests of the class ahead of my own. I also agreed to participate actively in my case and to assume the risks of serving as the named plaintiff, including but not limited to the reputational harm of having my name affiliated with an employment lawsuit and the potential resulting stigma from future prospective employers.

1 Therefore, I do not believe my interests to be antagonistic to the interests of the other class members,
2 and I believe myself to be an adequate class representative.

3 6. I provided my attorneys with a comprehensive history of my employment with
4 Defendant, as well as numerous documents relating to my employment with Defendant. Throughout
5 this litigation, I regularly conferred with my attorneys to discuss the status of the case, to offer my
6 input, and to assist my attorneys in gathering the evidence necessary to prosecute the claims. (Although
7 the preservation of my attorney-client privilege requires that I refrain from revealing the specifics of
8 my communications with my attorneys, I understand that the privilege is not waived by stating
9 generally matters that I have discussed with my attorneys. During our many conversations, and partly
10 in response to my numerous questions, my attorneys kept me well informed about the phases of the
11 litigation, the strategies for prosecuting each phase, and the risks associated with those strategies.

12 7. I worked closely with my attorneys and actively participated in the prosecution of my
13 claims by, among other things, reviewing documents and pleadings, providing information that assisted
14 my attorneys, and attempting to locate other potential witnesses. In particular, I participated in multiple
15 discussions with my attorneys regarding the job duties and daily activities at my job site, I gave detailed
16 information about Defendant's timekeeping, schedule, and payroll practices, and I educated my
17 attorneys on the intricacies and details of Defendant's unique business.

18 8. As a named Plaintiff in this action, I provided invaluable assistance to Class Counsel
19 and the Class in this case, including providing factual background for the mediation and Class
20 Complaints; reviewing the relevant documents and Complaint and First Amended Complaint;
21 participating in phone calls with my lawyers to discuss litigation and settlement strategy;
22 communicating with my lawyers to confirm or clarify facts related to the damage analysis in my case
23 and to keep up to date on the status of the litigation; participating in preparatory calls for the mediation
24 in this case; participating in a full-day mediation by telephone; thoroughly reviewing the settlement
25 documents; and assisting in the drafting of this declaration. I also anticipate assisting my attorneys in
26 a subsequent declaration for the motion for final approval of the settlement.
27
28

1 9. My efforts were instrumental in securing the favorable terms of the Settlement
2 Agreement, which will provide monetary compensation to the Class of \ current and former employees
3 of Defendant.

4 10. I remained available to assist my attorneys during settlement negotiations, and I have
5 actively reviewed the terms of the proposed settlement. My attorneys explained the specifics of how
6 the settlement would work, and I accepted the settlement only after I had spent enough time evaluating
7 the proposed outcome to assure that it was fair. Based on my attorneys' evaluation and
8 recommendation, and my own review, I believe the settlement is fair and reasonable and adequately
9 compensates the class members, and my support for the settlement is not contingent upon my receipt
10 of an incentive award.

11 11. In summary, over the course of this litigation I have spent a significant amount of time
12 conferring and working with my attorneys on the prosecution of my claims and evaluating the
13 settlement and related documents. I agreed to participate in this case with no guarantee of personal
14 benefit. I estimate that, to date, I have expended approximately 15 to 20 hours of my time working on
15 this case.

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

13. It is my understanding that based upon my industrious efforts as the named plaintiff in this action there is something called a service award for my time, risk, and the services that I provided as the named plaintiff. I respectfully request that the Court grant this award to me in the amount of \$7,500.00 in addition to my pro rata share of the settlement fund.

I declare under penalty of perjury under the laws of the State of California that all the foregoing is true and correct. Executed on 7/22/2026 in California.

DocuSigned by:

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ROBERT WINIECKI