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17 Individually and on behalf of all others similarly situated,
18 Additional counsel on following page*

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

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

24 Plaintiffs,

25 v.

26 WORLDWIDE FLIGHT SERVICES, INC., a
27 Delaware Corporation; WFS EXPRESS, INC.,
28 a Delaware Corporation and DOES 1-50,
inclusive,

Defendants.

Case No. 34-2023-00337627
ASSIGNED FOR ALL PURPOSES TO:
JUDGE: Hon. Lauri A. Damrell
DEPT: 8b

**DECLARATION OF TERRY SNIPES IN
SUPPORT OF PLAINTIFFS'
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT**

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and all others similarly situated

21 Attorneys for Plaintiff TERRY SNIPES

1 I, Terry Snipes, declare as follows:

2 1. I am one of the named plaintiffs in this class and representative action against
3 Defendants WORLDWIDE FLIGHT SERVICES, INC., a Delaware Corporation; WFS
4 EXPRESS, INC., a Delaware Corporation (collectively “Defendants” or “WFS”) and make this
5 declaration in support of the Class and Representative Action Settlement. I have personal
6 knowledge of the facts stated in this declaration, except as to those matters stated upon
7 information or belief, and, as to those matters, I believe them to be true. If called as a witness, I
8 could and would testify truthfully and competently to the matters stated in this Declaration.

9 2. I am in no way related to anyone associated with or who works for The Markham
10 Law Firm, or United Employees Law Group.

11 3. I have worked for Defendants as a non-exempt, hourly Warehouse Agent in
12 California from approximately February 2024 to the present. I was responsible for loading and
13 unloading packages from Amazon which originated from various states onto planes at Stockton
14 International Airport. I processed time-sensitive materials for pick-up, transit, and delivery
15 including sorting, loading, unloading, and material handling. The packages I handled included
16 packages moving from other states into California and internationally.

17 4. During my employment with the Defendants, I decided to consult with an attorney.
18 I initially spoke with the attorneys at United Employees Law Group, and then with the Markham
19 Law Firm. I decided to become a named plaintiff in a class action against WFS. In the complaint I
20 brought against WFS, I alleged that I was not paid for all of the overtime hours that I worked, not
21 provided all meal and rest periods, and not reimbursed business expenses I incurred, among other
22 claims. My attorneys explained the duties and responsibilities of a class representative to me, and I
23 decided to undertake this role for the benefit of other similarly situated employees of WFS.

24 5. I was very happy to learn that the case had settled on a class-wide and
25 representative basis as part of a global settlement, and it resulted in a settlement amount of
26 \$2,700,000.00 from which payments will be made to settlement class members/aggrieved
27 employees. I think this is an excellent result. I am proud that because of my efforts and willingness
28 to become a named plaintiff and class representative, other employees will benefit financially.

1 6. I have devoted approximately 70-80 hours to this case to date, and will devote
2 additional time up through settlement approval. I have spent many hours searching for documents,
3 and reviewing documents my attorneys asked me to review. I spent a lot of time answering my
4 attorneys' questions by phone, emails, and text messages about this case. I had to recall everything
5 I could remember about my employment and my claims alleged in this case.

6 7. I was also on standby for a full-day mediation. During the mediation, I had to be
7 available when my attorneys called or emailed me, asking questions pertaining to my claims in
8 this case.

9 8. I did my best to be available to my attorneys to answer any questions they had or
10 provide any information they needed. I returned their phone calls as promptly as I could and
11 answered any questions to the best of my ability. I complied with my attorneys' requests to review
12 documents and provide information.

13 9. By filing this lawsuit, I understood the risks involved. I now bear the stigma of
14 bringing a class and representative action against my employer. Additionally, given the internet, it
15 is quite likely that any potential future employers or professional affiliations might find out simply
16 by "googling" my name that I acted as a class representative in this action against my employer.
17 Regardless, I am happy to know that the time, effort, and information I provided helped to make
18 this settlement possible.

19 10. I am also aware that if I lost this case, I might have been responsible for WFS' costs
20 of defending this case. This added to the stress of assuming the role of a named plaintiff in this
21 case.

22 11. At times, it was challenging for me to participate in this case while balancing my
23 professional and personal obligations. The stress and uncertainty resulting from the demands of
24 this litigation placed strain on myself and my family. The demands of this ongoing litigation took
25 an emotional toll on me as I balanced working for my employer as this litigation continued, and
26 the stress in the back of my mind of facing potential stigma for bringing a lawsuit against my
27 employer. Despite that this has been an extremely difficult and stressful experience for me, I
28 believe my sacrifices and efforts have benefited other employees. For all of the reasons above, I

1 believe I deserve a Service Award of \$15,000.

2 12. I have no conflict of interest with any other aggrieved employees or class members.

3 13. I have separately entered into a confidential individual settlement agreement with
4 Defendants. If the Court requires, I understand the terms of the individual settlement can be
5 provided to the Court confidentially for in camera review.

6 14. I will supplement this declaration at final approval and provide more information
7 regarding the extent of my participation in this action and time devoted as requested by the Court.
8 I am committed to this case and will continue to make myself available throughout the rest of the
9 settlement process.

10 I declare under the penalty of perjury under the laws of United States and the State of
11 California that the foregoing is true and correct and that this declaration is executed on Jul 22, 2
12 _____, in Stockton, California.

13
14 
Terry Snipes (Jul 22, 2026 15:32:26 PDT)
15 Terry Snipes