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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ALAMEDA

IKRAM EL MAJDI, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

TRANSCORE, LP, a Delaware Limited
Partnership; GTN TECHNICAL STAFFING,
LLC, a Texas Limited Liability Company; and
DOES 1-50, inclusive.

Defendants.

CASE NO.: 23CV027554

Assigned to the Hon. Karin Schwartz

CLASS ACTION

**DECLARATION OF IKRAM EL MAJDI
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Information:

Date: July 30, 2026

Time: 3:00 p.m.

Dept.: 20

Reservation No. 193197931284

DECLARATION OF IKRAM EL MAJDI

I, Ikram El Majdi, state and declare:

1. I am the Plaintiff and proposed Class Representative in the above-captioned action. I have personal knowledge of the facts stated in this declaration and, if called as a witness, could and would competently testify to them. I submit this declaration in support of Plaintiff's Motion for Preliminary Approval of the Parties' Class Action and PAGA Settlement.

2. I was employed by Defendants as a non-exempt Field Maintenance Technician. During my employment, I performed field maintenance and related work on traffic management and public works projects throughout California. My duties required me to report to various locations, perform fieldwork, and complete assignments necessary to maintain and service Defendants' operations.

3. During my employment, I personally experienced many of the wage-and-hour practices alleged in the operative complaint. Based on my own experiences and discussions with coworkers, I believed these practices affected other non-exempt employees, not just me.

4. Because I personally experienced these practices, I understood that my claims were representative of the claims asserted on behalf of the Settlement Class and PAGA Members. Throughout this litigation, I remained committed to representing the interests of all current and former non-exempt employees, rather than pursuing only my own individual interests. I understood that any settlement would need to be fair, reasonable, and adequate for all affected employees and would ultimately require the Court's approval.

5. Although I initially hesitated to pursue legal action because I was concerned about the potential impact it could have on my future employment opportunities and professional reputation, I ultimately decided to move forward because I believed Defendants' practices affected many current and former employees, not just me. I retained experienced class action counsel because I believed the alleged violations should be investigated and, if appropriate, corrected for the benefit of all affected employees.

6. From the outset of this case, I understood that serving as the proposed Class Representative carried important responsibilities. I understood that my role was not simply to pursue

1 my own individual claims, but to fairly and adequately represent the interests of all Settlement Class
2 Members and PAGA Members. I understood that I was expected to remain informed about the
3 progress of the litigation, assist my attorneys in investigating and prosecuting the case, review
4 important pleadings and settlement documents, and evaluate any proposed settlement based on what
5 I believed was fair and reasonable for the class as a whole.

6 7. Throughout this litigation, I remained actively involved and maintained regular
7 communication with my attorneys. This case lasted more than three years and involved significant
8 litigation, including arbitration proceedings, before ultimately returning to court. Despite the length
9 of the litigation and the procedural challenges encountered along the way, I remained committed to
10 pursuing the case and fulfilling my responsibilities as the proposed Class Representative.

11 8. Over the course of the litigation, I participated in numerous telephone conferences and
12 virtual meetings with my attorneys. I answered questions regarding my employment, Defendants'
13 policies and practices, and the events giving rise to the claims alleged in this action. I also reviewed
14 drafts of pleadings, discussed litigation strategy, provided factual information and documents upon
15 request, and remained available to assist counsel as needed. Although I was never deposed, I
16 consistently cooperated with my attorneys and remained engaged throughout every stage of the
17 litigation

18 9. As the litigation progressed, my attorneys kept me informed regarding the status of
19 the case, the evidence obtained during the investigation, the legal issues involved, and the strengths
20 and weaknesses of the claims and defenses. They also explained the risks associated with continued
21 litigation, including the uncertainty of obtaining class certification, prevailing on the merits,
22 establishing damages, and the possibility of appeals that could substantially delay any recovery for
23 the Settlement Class and PAGA Members.

24 10. I also virtually attended the mediation before experienced mediator Marc Feder, Esq.
25 Before mediation, I worked with my attorneys to prepare for the session by discussing the facts of
26 the case, the evidence developed, and the issues likely to arise during settlement negotiations. During
27 the mediation, I remained available to consult with my attorneys, discuss the mediator's proposals,
28 evaluate settlement offers, and answer questions regarding my claims and experiences.

1 11. After the mediation concluded, I continued communicating with my attorneys
2 regarding the proposed settlement. I carefully reviewed the settlement agreement, the operative
3 pleadings, and other settlement-related documents before authorizing my attorneys to move forward
4 with the settlement. My attorneys answered my questions and explained the material terms of the
5 agreement, including the scope of the releases, the method for calculating payments to Settlement
6 Class Members and PAGA Members, the attorneys' fees and costs being requested, the proposed
7 service award, and the Court approval process.

8 12. Based on my involvement throughout this litigation, my participation in the mediation
9 and settlement negotiations, and my discussions with my attorneys, I believe the proposed settlement
10 is fair, reasonable, and adequate. I understand that continued litigation would involve substantial
11 additional time, expense, and uncertainty for everyone involved. In my opinion, the settlement
12 provides a meaningful recovery for current and former employees while avoiding the risks associated
13 with continued litigation, and it serves the best interests of the Settlement Class and the PAGA
14 Members.

15 13. Throughout this litigation, I have consistently placed the interests of the Settlement
16 Class and PAGA Members on par with, and at times above, my own individual interests. At every
17 stage of the case, including when evaluating the proposed settlement, I considered whether the
18 outcome was fair and reasonable for the employees I sought to represent. I would not have authorized
19 the settlement if I did not believe it served their best interests.\

20 14. Serving as the proposed Class Representative required me to devote a substantial
21 amount of my personal time and attention to this case over the course of more than three years.
22 Throughout the litigation, I remained available to communicate with my attorneys, answer questions,
23 review documents, assist in the investigation of the claims, participate in mediation, and evaluate the
24 proposed settlement. I willingly undertook these responsibilities because I believed it was important
25 to pursue relief not only for myself but also for other employees affected by the practices alleged in
26 this action.

27 15. By agreeing to serve as the proposed Class Representative, I also assumed
28 responsibilities and risks that were not borne by the absent Settlement Class Members. I understood

that my name would appear on publicly filed court documents, that my participation in this lawsuit could become known to current and prospective employers, and that serving as the named plaintiff required me to devote time and effort over several years without any guarantee of success or recovery. Despite these concerns, I remained committed to representing the interests of the Settlement Class and PAGA Members throughout the litigation.

16. As part of the proposed settlement, I have also agreed to provide a substantially broader general release of claims than the release that will be provided by the Settlement Class Members. I understand that this additional release is being given in exchange for the requested Class Representative Service Award and reflects my unique role and responsibilities in bringing and prosecuting this action on behalf of the Settlement Class and PAGA Members.

17. I respectfully request that the Court approve the requested Class Representative Service Award of \$15,000. In my opinion, the requested award fairly recognizes the time, effort, responsibilities, and risks I undertook in serving as the proposed Class Representative throughout this litigation. I further believe the requested award is reasonable in light of the benefits the proposed settlement provides to the Settlement Class and PAGA Members.

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

DocuSigned by:
Ikram El Majdi
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IKRAM EL MAJDI