

Taras Kick (SBN 143379)
Taras@kicklawfirm.com
Tyler J. Dosaj (SBN 306938)
Tyler@kicklawfirm.com
THE KICK LAW FIRM, APC
815 Moraga Drive
Los Angeles, California 90049
Telephone: (310) 395-2988
Facsimile: (310) 395-2088

Attorneys for Plaintiffs COREY J. DEVINE,
and JERMAINE WILLIS, individually,
and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF TUOLUMNE

ANDREA OTANEZ VERDUGO, individually, and
on behalf of others similarly situated

Plaintiff,

v.

CAPSTONE LOGISTICS, LLC, a Delaware
Limited Liability Company with its principal place
of business in Georgia; and DOES 1 through 100,
inclusive,

Defendants.

CASE NO.: CV66120

UNLIMITED CIVIL

**DECLARATION OF JERMAINE WILLIS IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE PAGA ACTION
SETTLEMENT**

Date: November 12, 2025

Time: 8:30 a.m.

Dep: 5

Hon. Steven S. Streger

Action Filed: April 22, 2024

I, Jermaine Willis, hereby declare as follows:

1. I am an Intervenor and proposed Class Representative in the above-captioned class and representative action, *Verdugo v. Capstone Logistics LLC*, No. CV66120, Tuolumne County Superior Court.

2. I am over 18 years of age and make this declaration based on my personal knowledge. If called as a witness, I could and would testify competently thereto.

3. This declaration is submitted in support of Plaintiffs' Motion for Preliminary Approval of Class and Representative PAGA Action Settlement.

4. I worked for Defendant as a non-exempt employee from approximately September 2023 to June 2024 and was subject to one or more of the violations of the Labor Code at issue in this case.

5. I seek to represent current and former non-exempt employees who worked for Capstone in California and were subject to the same uniform policies and procedures with respect to timekeeping and payroll.

6. Despite my concerns about how a lawsuit could potentially affect my job prospects, I believe that Capstone should be held accountable for how they treat their employees and decided to pursue these claims.

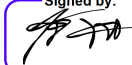
7. Since retaining my attorneys, I have been actively involved with the case. For instance, I spent a significant amount of time looking for and reviewing documents and speaking with my attorneys regarding the facts of the case. Moreover, throughout the litigation, I have maintained regular contact with my attorneys and received updates from them. I discussed the mediator's proposal and settlement agreement with my attorneys, evaluated whether the settlement was fair and reasonable, and reviewed and signed the settlement agreement.

8. Before and during the litigation, I was advised by my attorneys about my duties and responsibilities as a representative for other current and former employees. I have taken these duties seriously and was actively involved in my case throughout. I understand the factual allegations, and, as far as I am aware, my experience is typical of Capstone's employees in California. I have no interest that is adverse to, or even substantially different from, any other employee.

9. I was never offered anything to serve as the class representative, and I understand that my duty to the class is ongoing until the litigation is fully resolved. I do not anticipate receiving any benefit as a result of my participation other than my individual class member award, and if approved, the requested service award. Ultimately, I believe the settlement is fair, adequate, and reasonable because it holds Capstone accountable and will provide money to the proposed class, sooner rather than later.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my belief and knowledge.

Executed on 10/29/2025 in Sacramento, California.

Signed by:

E76C1ADABD69487...
Jermaine Willis