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Attorneys for Plaintiffs
ADRIANA MAGDALENA RAMOS
and VINCENT TURNER

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

ADRIANA MAGDALENA RAMOS and
VINCENT TURNER, individually and on
behalf of all others similarly situated,

Plaintiffs,

vs.

ROADSAFE TRAFFIC SYSTEMS, INC.; and
DOES 1 through 20, inclusive,
Defendants.

Case No. 34-2023-00334458-CU-OE-GDS
[Consolidated with Case No. 23CV001415]

Assigned for all purposes to:
Hon. Lauri A. Damrell, Dept. 22

**SUPPLEMENTAL DECLARATION OF ALEX
J. VALLE IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

Date: February 7, 2025
Time: 10:30 a.m.
Dept: 22

1 I, Alex J. Valle, hereby declare as follows:

2 1. I am an attorney at law licensed to practice before all of the courts of the State of
3 California. I am an associate at Aegis Law Firm, PC (“Aegis”), counsel for Plaintiff Adriana Magdalena
4 Ramos and Plaintiff Vincent Turner (collectively, “Plaintiffs”) in this matter. I am thoroughly familiar
5 with and have personal knowledge of all of the facts set forth herein.

6 2. I submit this supplemental declaration in support of Plaintiffs’ Motion for Preliminary
7 Approval of Class Action Settlement in response to the Court’s tentative ruling. If called as a witness, I
8 could and would competently testify thereto.

9 3. The Parties agreed to amended the class and PAGA releases in the settlement agreement
10 and the class notice to conform to the Court’s guidance. The Parties agree to address the Court’s other
11 concerns at final approval, as indicated in the tentative ruling.

12 **Exhibits**

13 4. A true and correct copy of the amended settlement agreement executed by Plaintiffs is
14 attached hereto as **Exhibit 1**.

15 5. A true and correct copy of the redlined settlement agreement and class notice showing
16 the Parties’ changes is attached hereto as **Exhibit 2**.

17 6. A true and correct copy of the LWDA’s confirmation that my office submitted the
18 settlement agreement and motion for preliminary approval is attached hereto as **Exhibit 3**.

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

21 Executed on January 31, 2025 at Irvine, California.

22
23 /s/ Alex J. Valle
24 Alex J. Valle
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