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Attorneys for Plaintiff CHRISTIAN SANCHEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ALAMEDA

CHRISTIAN SANCHEZ, ATU AKINLABI
WATSON, and TYRON WESLEY
MCCARTHER, individuals, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

SPOKE LOGISTICS, LLC, a Wyoming
Limited Liability Company, and Does 1-25,
Inclusive,

Defendant.

Case No. 23-CV-035138

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Victoria Kolakowski

Department 16

CLASS AND REPRESENTATIVE ACTION

**DECLARATION OF CHRISTIAN
SANCHEZ IN SUPPORT OF MOTION
FOR: 1) FINAL APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT AND 2) APPROVAL OF
ATTORNEYS' FEES AND COSTS,
ADMINISTRATION COSTS, AND
CLASS REPRESENTATIVES' SERVICE
AWARDS**

Date: October 22, 2026

Time: 2:30 p.m.

Dept.: 16

Reservation: A-35138-001

SPOKE LOGISTICS, LLC, a California
Corporation,

Cross-Complainant,

v.

HE IS THE WAY TRANSPORT
SERVICES, INC.,

Cross-Defendant.

Complaint filed: June 6, 2023
Trial Date: Not Set

Complaint filed: September 11, 2023
Trial Date: Not Set

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Attorneys for Plaintiffs ATU AKINLABI WATSON and TYRON WESLEY MCCARTHER

1 I, Christian Sanchez, declare:

2 1. I am the named plaintiff/class representative in this action and make this
3 declaration in support of the Motion for Final Approval of the Class and Representative Action
4 Settlement with Defendant Spoke Logistics, LLC ("Spoke Logistics"). I have personal
5 knowledge of the facts stated in this declaration, except as to those matters stated upon
6 information or belief, and, as to those matters, I believe them to be true. If called as a witness, I
7 could and would testify truthfully and competently to the matters stated in this Declaration.

8 2. I am not related to, nor do I have any personal or financial relationship with,
9 anyone associated with The Markham Law Firm, Cohelan Khoury & Singer, United Employees
10 Law Group, or Sirmabekian Law Firm. I also have no conflicts of interest with any member of
11 the class.

12 3. When I decided to bring this case on behalf of current and former drivers of
13 Spoke Logistics, I understood that I was seeking compensation not only for myself but also for
14 other drivers. I also knew that pursuing the case as a class representative would delay the
15 resolution of my own claims. I accepted that responsibility because many of these drivers were
16 either unaware of their legal rights or were afraid to raise concerns with the company for fear of
17 losing their jobs. It is gratifying to know that, because this case settled, approximately 290
18 current and former employees will receive compensation.

19 4. I understood that by bringing this case, I risked having a judgment entered
20 against me for some or all of Spoke Logistics' costs if I did not prevail. I also understood that
21 filing this lawsuit could negatively affect my future employment opportunities. Potential
22 employers can easily search my name online, discover that I filed this lawsuit, and decide not to
23 hire me because they fear I might bring similar claims against them. I understood that pursuing
24 this case therefore carried a personal risk that it could affect my ability to find work in the
25 future.

26 5. I was also worried about the effect that bringing this lawsuit could have on my
27 reputation. I did not want to be viewed as a disgruntled former employee. I was concerned that
28 being known as someone who had sued my former employer could cause people in my industry

1 to view me differently or question my character or professionalism. I nevertheless accepted
2 these risks because I believed the claims were important and that pursuing them was the right
3 thing to do.

4 6. Since I first began working on this case more than 3 years ago, I estimate that I
5 have devoted approximately 75-85 hours to it. I began assisting with the case before it was even
6 filed. Over the course of the litigation, I spent significant time communicating with my
7 attorneys by telephone and email to answer questions about my claims and the facts of the case.
8 I searched for, organized, and produced records and other documents relevant to the litigation,
9 and I reviewed documents and information that my attorneys asked me to examine and explain,
10 including materials produced by Spoke Logistics. Throughout the case, I remained in regular
11 contact with my counsel, made myself available to answer questions, and promptly responded
12 to requests for additional information or documents. I also remained on standby by telephone
13 for an entire day during the mediation so that my attorneys could contact me if they needed
14 information regarding my claims or authority to address issues that arose during the settlement
15 negotiations. I spent additional time reviewing settlement documents and declarations in support
16 of this settlement.

17 7. One of the most difficult and unexpected consequences of bringing this lawsuit
18 was that Spoke Logistics sued my father's company, He Is the Way Transport Services, Inc., in
19 a separate Cross-Complaint arising out of the same events involved in this case. Spoke sought
20 damages, costs, and attorneys' fees from my father's company, including the attorneys' fees and
21 costs Spoke claimed it incurred because of my lawsuit. This caused me a tremendous amount of
22 distress. My father suffered a stroke approximately two years ago, and it has been extremely
23 difficult for me to know that he has had to deal with the stress of litigation because I chose to
24 pursue my claims. I have worried about the effect of this litigation on his physical and mental
25 health, and I have also felt guilty that my decision to bring this case placed this additional
26 burden on him and his business. I never intended for my father to become involved in litigation
27 because of my decision to stand up for my rights and the rights of other drivers.
28

1 8. The litigation has also been particularly difficult because both of my parents are
2 now retired, and I have become their primary caregiver. I have had to balance caring for my
3 parents with my responsibilities as the class representative and my work. There were times
4 when I had to take time away from my parents and take time off work to be interviewed,
5 participate in telephone calls with my attorneys, respond to emails, review documents, attend
6 mediation, and otherwise assist with the case. These were sacrifices I made because I
7 understood that my continued participation was important to prosecuting the case and obtaining
8 a recovery for the other drivers.

9 9. I also suffer from anxiety and depression, PTSD, diabetes that has significantly
10 affected my vision, and high blood pressure. The demands of this litigation have made these
11 difficulties harder to manage. I have a very difficult time making telephone calls when my
12 anxiety becomes severe, yet I have had to participate in numerous calls and conversations
13 concerning the lawsuit. My vision problems have also made reading and responding to the legal
14 documents associated with this case increasingly difficult. Calls, emails and interviews have
15 been mentally exhausting for me, and I experience significant stress when I have to stop what I
16 am doing to deal with litigation matters. My blood pressure becomes elevated when I have to
17 handle calls, emails, or other matters relating to the lawsuit. Despite these difficulties, I
18 continued to make myself available to my attorneys and fulfill my responsibilities as class
19 representative throughout the litigation.

20 10. The lawsuit was therefore not simply a matter of spending some time
21 communicating with my attorneys. It has been a source of ongoing stress and has required
22 sacrifices involving my work, my responsibilities to my parents, and my own physical and
23 emotional well-being. Even when I was not actively working on the case, I would think about
24 what might happen to my father and his business, what I might need to do next, and how I
25 would manage the demands of the litigation. Nevertheless, I continued to participate because I
26 believed the claims were important and because I wanted to obtain a recovery not only for
27 myself, but for the other drivers whose rights were at issue.

28 11. As the sole named plaintiff in this case, I took my responsibilities to the other

1 drivers seriously. I worked closely with my attorneys, promptly responded to their requests,
2 provided information and documents, and made myself available whenever necessary to assist
3 in prosecuting the case and reaching a resolution. I did this despite the risks to my reputation
4 and future work opportunities, the time and income I sacrificed, the effect on my family, the
5 litigation against my father's company, and the significant stress associated with having this
6 litigation hanging over me. I believed these sacrifices were worthwhile because I wanted to
7 obtain a recovery not only for myself but also for the other drivers whose rights were at issue in
8 this case.

9 12. I understand that, unlike other class members, I am providing a complete release
10 of any and all claims against Spoke Logistics, whether known or unknown, as part of the
11 settlement of this case. In light of the broad release I am providing, the more than 75 hours I
12 devoted to this litigation, the personal and financial sacrifices I made, the additional burden
13 placed on my family when Spoke sued my father's company, and the significant physical and
14 emotional stress I experienced while continuing to serve as class representative, I respectfully
15 request, and believe it is reasonable to receive, the \$15,000 service payment provided for in the
16 settlement agreement.

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct. Executed on Redwood City, in 9/15/2026, California.

Signed by:

Christian Sanchez

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Christian Sanchez