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Attorneys for Plaintiff and on behalf of the Proposed Class

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

BRIANA ARREOLA, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

FLEET SERVICES, INC., a California
Corporation; DICK VAN ECK, an
individual; and DOES 1 through 20,
inclusive;

Defendants.

Case No.: 30-2023-01316151-CU-OE-CXC
*[Assigned to Hon. Lon F. Hurwitz, Dept CX103,
for all purposes]*

**DECLARATION OF PLAINTIFF
BRIANA ARREOLA IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL**

Complaint filed: October 7, 2022

I, Briana Arreola, state and declare:

1. I am the Plaintiff in the above captioned action and have personal knowledge of all matters stated herein and could competently testify thereto. I make this declaration in support of the motion for preliminary approval of the class action settlement. I believe that the settlement is fair and reasonable and constitutes a fair resolution of the claims alleged.

2. When I first retained my attorneys (Lauby, Mankin & Lauby), I chose to pursue this case on a class action basis rather than as an individual claim. In that regard, I understood that I had specific burdens as the "Class Representative," which included: (a) representing the

1 interests of all class members, (2) considering the interests of all class members above my own
2 personal interests, (3) participating actively in the lawsuit, including potential testimony at
3 deposition and trial, and keeping generally aware of the status and progress of the lawsuit.
4 Moreover, I understood that any resolution of the lawsuit is subject to court approval and must
5 be designed in the best interests of the class as a whole.

6 3. Since first initiating this action on behalf of the proposed class, I believe that I
7 have more than adequately performed my duties as a class representative. I have been an active
8 participant in this litigation, including assisting my attorneys in various ways and making myself
9 available when needed, as well as proactively updating my attorneys when I found out new
10 information, such as notifying them of store closures and relocation of relevant documents. For
11 example, I have assisted my attorneys by compiling and analyzing substantial documentation
12 regarding the claims in this case. I have also helped to explain and discuss the company's
13 practices and their general practices and procedures, locating and analyzing company documents,
14 among others. I have also reviewed all settlement documents and believe that this settlement is
15 fair for the class. Finally, I will continue to take all steps necessary to finalize this settlement and
16 obtain court approval.

17 4. I have no conflicts with the proposed class members and will continue to assist
18 with the litigation and prosecute the case on behalf of the other employees.

19 5. I respectfully request that the court preliminarily approve the service award. As
20 outlined above, I have performed substantial services for the Class and helped obtain a highly
21 beneficial settlement for my fellow employees. And I have also agreed, as part of this Class
22 action settlement, to waive all of my claims against the company as part of this settlement and in
23 exchange for the service award – which goes well beyond the release given by other class
24 members. At the final approval stage, I will submit an additional declaration setting forth all the
25 work I did for this case, including an estimated number of hours spent assisting the Class and my
26 attorneys.

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28 ///

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct. Executed on Sep 5, 2024, at Anaheim, California.

3
4 By:


Briana Arreola (Sep 5, 2024 11:41 PDT)

Briana Arreola