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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

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. Layne Melzer, Dept CX102,  
for all purposes]*

**DECLARATION OF PLAINTIFF  
BRIANA ARREOLA IN SUPPORT OF  
MOTION FOR FINAL APPROVAL**

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

1           3.       I was employed by Defendants from approximately August 2022 through January  
2 2023. During my employment with Defendants, there were several issues that concerned me and  
3 which I thought did not comply with California law, such as not being paid properly and not  
4 getting proper meal periods and rest breaks. As a result, I retained Lauby, Mankin & Lauby LLP  
5 to move forward with a case because I did not think that I or the other employees were being  
6 treated correctly.

7           4.       After retaining my attorneys, I understood that I had two options: I could pursue  
8 my individual case – including claims for wrongful termination (as discussed below), or I could  
9 bring a class/representative action and put the interests of the class ahead of my own. The  
10 decision of whether to bring my individual claims or to bring a class action put me in a tough  
11 spot, because on the one hand, I wanted to hold the company accountable for how they treated  
12 me and, on the other hand, I wanted to help other employees that were not paid correctly. And I  
13 knew that, if I wanted to bring a class action, I would need to put the interests of the class first  
14 to better serve the class. In the end, in the interest of helping all employees that were subjected  
15 to the wage violations, I decided to help everyone by bringing a class/representative action.

16           5.       Since first initiating this action, I estimate that I have spent at least forty-five (45)  
17 hours engaged in activities to benefit the class including. I have assisted my attorneys in numerous  
18 ways, including helping to explain and discuss the company's practices and their general practices  
19 and procedures, locating and analyzing company documents. These efforts occurred through  
20 numerous meetings with Class Counsel, telephone conferences, letters, emails, and text  
21 communications. I also assisted in preparation for mediation and helped obtain a positive result  
22 for the class. Thereafter, I reviewed the MOU and settlement agreement and discussed the  
23 approval process with my attorneys.

24           6.       I also believe that the requested service award is fair and reasonable given that I  
25 have faced substantial risks and made numerous sacrifices to obtain this class action settlement.

26           7.       For example, filing this lawsuit and being a whistleblower was stressful on a day-  
27 to-day basis as I have constantly worried about the risk that this could impact my ability to find  
28 future jobs. I was worried that filing the case may get me labeled as a whistleblower, resulting in

1 retaliation and difficulty finding work for the rest of my career.

2 8. I believe that request for the \$5,000 service award is justified based on (a) the time  
3 I have spent on the case, which resulted in a good settlement for the class, (b) the risks I took in  
4 bringing this case, which I believe my ability to find future work will be impacted, and (c) my  
5 agreement to waive all of my individual claims in exchange for the requested service award.

6 9. I received notice that I will receive \$233.73 as my individual portion of the class  
7 ,settlement.

8 10. I respectfully request that the Court approve this class action settlement. I agreed  
9 to set aside my personal interests, and to put the interests of the class ahead or on par with my  
10 own. In doing so, and by successfully bringing this case as a class action, I helped to obtain a  
11 highly beneficial settlement for the class members.

12 I declare under penalty of perjury under the laws of the State of California that the  
13 foregoing is true and correct. Executed on Aug 23, 2025, at Briana Arreola, California.

14  
15 By:

  
Briana Arreola (Aug 23, 2025 23:10:16 PDT)  
Briana Arreola