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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

DAVID REESE, ISAAC KHARAUD,
PATRICIA BROWN, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiffs,

vs.

VEOLIA TRANSPORTATION, an unknown
business entity; TRANSDEV SERVICES,
INC., a Maryland corporation; and DOES 1
through 100, inclusive,

Defendants.

VICTOR DIAZ, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

TRANSDEV NORTH AMERICA, INC., a
California Corporation and DOES 1-50,
inclusive,

Defendants.

Case No.: 21STCV29413 (lead)
[Related to Case Nos. 21STCV36076;
22STCV32496; 22STCV38405; and
23AHCV02160]

Honorable Carolyn B. Kuhl
Department 12

CLASS ACTION

**DECLARATION OF DAVID REESE
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT**

Complaint Filed:	August 10, 2021
FAC Filed:	March 8, 2023
Diaz Complaint Filed	October 4, 2022
Diaz FAC Filed	February 20, 2024
Trial Date:	None Set

DECLARATION OF DAVID REESE

I, David Reese, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned cases. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I am employed by Veolia Transportation, Transdev North America Inc, and Transdev Services, Inc. (together, the “Defendants”). I started working around September 2014 as a non-exempt employee in California. I decided to seek legal advice about my work experiences with Defendants and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative. Prior to commencing the cases, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the cases, I have spent time speaking with my attorneys regarding the cases and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other non-exempt employees or equivalent positions however titled in the State of California, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

3 5. Throughout this matter, I was available to answer any questions my attorneys had,
4 and available to speak and meet with my attorneys whenever they needed me. I responded to them
5 as quickly as possible and gave them as much information and identified as many documents as I
6 could. I spent time speaking with my attorneys about the cases, identifying potential witnesses,
7 providing my attorneys with documents and information concerning the cases, and also describing
8 policies, practices, and procedures of Defendants.

6. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the Settlement Agreement and discussed the questions I had regarding the potential settlement with my attorneys before signing the settlement papers.

7. I think my efforts helped to get the result obtained in these matters, and as a potential class and PAGA representative, I respectfully request that the Court award me an enhancement award for my efforts in pursuing and participating in these matters, as well as my broader release of claims. Taking into consideration the time that I have dedicated to these matters, I believe that this amount is reasonable.

18 8. I am not related to anyone associated with Lawyers *for* Justice, PC and James
19 Hawkins, APLC.

9. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in these matters. The only compensation I will receive is whatever amount the Court awards as an enhancement award, as well as my share of the settlement as a class member and aggrieved employee.

24 I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct. 06/13/2026

Executed on this day of 2026, at Ramona, California.

Electronically Signed _____ 2026-06-13 15:25:15 UTC - 107.115.224.12
Nintex AssureSign® _____ d36b666-cfc-4662-bee8-b46701505da
David Reese