

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Fletcher W. Schmidt (SBN 286462)
fschmidt@haineslawgroup.com
Matthew K. Moen (SBN 305956)
mmoen@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

AEGIS LAW FIRM, PC
SAMUEL A. WONG, State Bar No. 217104
KASHIF HAQUE, State Bar No. 218672
JESSICA L. CAMPBELL, State Bar No. 280626
9811 Irvine Center Drive, Suite 100
Irvine, California 92618
Telephone: (949) 379-6250
Facsimile: (949) 379-6251
Email: jcampbell@aegislawfirm.com

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

RUBEN HERNANDEZ, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

NEOVIA LOGISTICS SERVICES, LLC, a
Delaware Limited Liability Company; NEOVIA
LOGISTICS DISTRIBUTION, LP, a Delaware
Limited Partnership; and DOES 1 through 100,

Defendants.

Case No.: CIVSB 2305867

**DECLARATION OF ARTURO
RAMIREZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: September 11, 2024
Time: 8:30 a.m.
Dept.: S36

Action Filed: March 2, 2023
Trial Date: None Set

I, Arturo Ramirez, hereby declare as follows:

1. I am one of the named Plaintiffs in the above-entitled matter.

2. I am making this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement. I have personal knowledge of the matters stated herein and could and would competently testify thereto.

3. I worked for Defendant as a Forklift Driver since approximately June of 2022.

4. Based on my experience and knowledge of Defendant's wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on my behalf and on behalf of the other employees at Defendant.

5. I am seeking to become a Class Representative in this case for the purpose of having the Settlement Agreement approved. I believe my experiences are similar to other employees who worked for Defendant. I believe we were all subject to the same employment policies and practices.

6. I do not have conflicts with other employees that would hinder my ability to represent them. Therefore, I believe I can adequately represent the other non-exempt employees of Defendant.

7. My interests as a named plaintiff in this litigation are not adverse to the interest of the other employees. My interests are the same as the interests of the other employees because we were all subject to the same policies and practices and were similarly injured by Defendant's company-wide policies and practices. I am seeking the same recovery on behalf of myself and other employees, which is to collect unpaid wages, interest, and penalties that are owed by Defendant, pursuant to the Settlement Agreement.

8. I have always kept the best interests of the other employees in mind while performing my duties as one of the named plaintiffs in this action. I have been committed throughout the course of this litigation to vigorously prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the other employees by initiating this lawsuit, providing documents to my attorneys pertaining to

1 my employment with Defendant, going over the claims and theories with my attorneys, keeping
2 in regular contact with my attorneys regarding the status of this lawsuit, helping my attorneys
3 evaluate the case for settlement, and reviewing the settlement agreement and its terms to make
4 sure it was fair.

5 9. I will continue to actively participate in this lawsuit as necessary, and will continue
6 to make myself available to assist in this case in the future as needed.

7
8 I declare under penalty of perjury under the laws of the State of California that the
9 foregoing is true and correct.

10 Executed on 08/14/2024
11 in California.

12
13 DocuSigned by:
14 Arturo Ramirez
15 D29F1B2E6B814F8...

16
17
18
19
20
21
22
23
24
25
26
27
28 Arturo Ramirez