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JAIME FURLOUGH, MICHAEL CHEN, and MARTHA LOPEZ

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

ANTHONY VASQUEZ, MELVIN
WILLIAMS, JAIME FURLOUGH, and
MICHAEL CHEN on behalf of themselves
and all similarly situated persons, and the
general public,

Plaintiffs,

vs.

XPRESS GLOBAL SYSTEMS LLC and
DOES 1 through 25, inclusive,

Defendant.

Case No. 23CV034375

[Assigned for all Purposes to the Hon.
Michael Markman, Dept. 23]

**DECLARATION OF ANTHONY
VASQUEZ IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND
APPLICATION ATTORNEYS FEES AND
COSTS**

[Complaint filed: June 20, 2019]

DECLARATION OF ANTHONY VASQUEZ

I, ANTHONY VASQUEZ, declare that:

1. I am a competent adult, over the age of eighteen (18) and am a plaintiff and class representative in the above-entitled action. I have personal knowledge of the facts stated herein except as to those matters stated upon information or belief, and, as to those matters, I believe them to be true. If called as a witness, I could and would testify truthfully and competently to the matters stated herein. Capitalized terms used but not defined in this declaration have the same definition as used in the accompanying Motion for Final Approval and Application for Attorneys' Fees and Costs.

2. I started working for Xpress Global Systems, Inc. ("Xpress Global") in April 2021.

3. In or around February 2023, I first retained attorneys Brian Kowalski of KOWALSKI EMPLOYMENT LAW, P.C.

4. On May 24, 2023, by and through my attorneys, I filed the complaint in this action. The purpose of the lawsuit is to recover unpaid wages, including reimbursement of business expenses, pay premiums for rest break violations, penalties for inaccurate wage statements, and penalties for the labor code violations.

5. Throughout the case, I have been actively involved in pursuing information that could support the case, and ultimately, I believe my efforts helped the Class Members. My efforts included my initial consultation with my previous attorneys and current attorneys, searching and locating documents, reviewing documents securing participation of additional class members, maintaining regular contact with my attorneys, and reviewing all relevant information and documentation provided to me by my attorneys.

6. I am not related to anyone in this action and am I not associated with any person, who work for the law firm of Nathan & Associates, APC or Kowalski Employment Law P.C. I have not received and will not receive an undisclosed compensation in this case. The only compensation I will receive is whatever amount this Court awards me as Class Representative Service payment, as well as my share of the Settlement Fund as a Class Member and PAGA Member.

7. As discussed below, I request that the Court award me a Class Representative service Payment of Two Thousand Five Hundred Dollars (\$2,500.00) and Seven Thousand Five Hundred

1 Dollars (\$7,500.00) in exchange for a General Release. At the time I separated my employment, I
2 was already a target of retaliation because consistently raised and discussed workplace violations
3 with other employees and managers that I believed Xpress Global should correct. I felt like I was
4 constantly belittled by management after I raised my concerns. At times I was frustrated because I
5 believed I was standing up for the rights of employees but other people at work did not like it.

6 8. I feel this amount is justified by my expenditure of time, and the personal risk I
7 assumed. I suffered risks to future employment by filing this case. I understand from my attorneys
8 the the excellent results in this case are unusual compared to most class cases, which I believe also
9 supports my service award.

10 9. During my employment with Defendants, I was not provided lawful rest breaks or
11 compensation in lieu of, I was not provided itemized accurate wage statements, I was not reimbursed
12 for business expenses, and I am owed penalties under the labor code. The Class Members suffered
13 the same or substantially similar injuries as me.

14 10. From December 2022 to the present date, I have spent approximately 35 hours
15 searching for documents on my computer and emails. I located several documents that appeared to
16 fit the description of the documents which continued throughout the litigation. After reading through
17 emails and attachments, I located several separate documents that I provided to Brian Kowalski.

18 11. In or about February 1, 2023, I signed a retainer agreement and spoke with Brian
19 Kowlaski for approximately 60 minutes regarding the documents I provided.

20 12. During the time of February 2023 through the present date, I spent approximately 9
21 hours with Brian Kowalski providing him with information he requested to create a discovery plan,
22 prepare litigation strategy for the case, conferring with others, scheduling times, and attempted to put
23 my attorneys in contact with as many former employees of Defendants as possible, participating in
24 settlement and the Motion for Preliminary Approval.

25 13. On January 2, 2024, I took the entire day off of work per my attorneys request to be
26 available for the mediation. I made myself available for the full-day mediation and took time off of
27 work for a total of 8 hours.

7 16. I spent an additional 1 hour reviewing my files and preparing this declaration.

10 18. I did not file a separate claim for retaliation against Defendant. I understand that I am
11 releasing those claims through the general release.

12 I declare under penalty of perjury under the laws of the State of California and the United
13 States of America that the foregoing is true and correct.

14 Executed on October 1, 2024, at Corona, California.

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