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Attorneys for Plaintiff **MELVIN WILLIAMS**

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 MELVIN
WILLIAMS IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND
APPLICATION ATTORNEYS FEES
AND COSTS**

[Complaint filed: June 20, 2019]

DECLARATION OF MELVIN WILLIAMS

I, **MELVIN WILLIAMS**, 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 March 2020.

3. In or around March 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 This action on behalf of 50 exempt and 48 non-exempt employees. The purpose of the lawsuit was 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. 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 became involved in this lawsuit,
2 I was an employee of Xpress Global. Once Xpress Global discovered I was a named plaintiff in this
3 case, I suffered a tremendous amount of retaliation. The retaliation was so bad that I was forced to
4 resign. I believe I should be compensated for what I endured.

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

9 9. On March 2023 to the present date, I spent approximately 42 hours searching for
10 documents on my computer and emails. I located several documents that appeared to fit the
11 description of the documents which continued throughout the litigation. After reading through emails
12 and attachments, I located several separate documents that I provided to Brian Kowalski. I even called
13 the Human Resources department several times to obtain files and other documents requested by my
14 attorneys.

15 10. In or about February 1, 2023, I signed a retainer agreement and spoke with Brian
16 Kowlaski for approximately 30 minutes regarding the documents I provided.

17 11. In or about March 2023, after conferring with my co-counsel Reuben Nathan of
18 Nathan & Associates, APC for approximately 30 minutes.

19 12. During the time of March 2023 to the present date I spent approximately 5 hours with
20 Brian Kowalski providing him with information he requested to create a discovery plan, prepare
21 litigation strategy for the case, conferring with others, scheduling times, and attempted to put my
22 attorneys in contact with as many former employees of Defendants as possible, participating in
23 settlement and the Motion for Preliminary Approval.

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

27 14. In or about June 10, 2024 I received the long form settlement agreement from my
28 attorneys. I spent 2 hours reading over the settlement agreement and consulting with my attorneys.

5 17. I have spent a total of approximately 59 hours in serving as a class representative in
6 this case as set forth in the details above.

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

9 Executed on October 1, 2024, at Las Vegas, Nevada

DocuSigned by:
MELVIN WILLIAMS 1/2024
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Melvin Williams