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Attorneys for Plaintiff, LUCAS LEE
on behalf of himself and all others and similarly situated

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

LUCAS LEE, on behalf of himself and all
others similarly situated,

Plaintiffs,

vs.

GN TRANSPORTATION LLC, a
Wisconsin corporation,

Defendant.

Case No. 23STCV14934

Assigned For All Purposes To:
Judge: Hon. William Highberger
Dept.: 10

**DECLARATION OF LUCAS LEE IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

PRELIMINARY APPROVAL HEARING
Date:
Time:
Dept:

DECLARATION OF LUCAS LEE

I, Lucas Lee, declare as follows:

1. I am an adult resident of the State of California and a Named Plaintiff and PAGA Representative in the case of *Lee v. GN Transportation LLC*, Los Angeles Case No. 23STCV14934. I make this declaration on the basis of my personal knowledge and if asked to testify thereto I could and would do so. I make this declaration entirely of my own free will and

choice. Before signing this declaration I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

2. I was employed by Defendant CJ Logistics Transportation LLC fka GN Transportation LLC ("GN") from on or about March 21, 2022 through on or about April 22, 2022 and occupied an exempt position as a Truck Dispatcher.

3. Prior to retaining the law firm of James Hawkins APLC to redress the grievances that I had against GN, I was made aware of the advantages and disadvantages of litigation. I was also made aware of my responsibilities as both a Plaintiff and a class representative prior to filing the class action complaint which was filed on April 21, 2023. I accepted the responsibility and agreed to move forward. I also accepted the responsibilities as a named plaintiff and representative under the Private Attorneys General Act ("PAGA") prior to filing the PAGA complaint which was filed on June 27, 2023. I pledged to participate actively in the lawsuits.

4. By agreeing to bring this action, I formally accepted the responsibilities of representing the interests of Aggrieved Employees in California and willingly chose to assume risks and potential costs that I alone might have to bear if judgement would have been rendered in favor of GN.

5. I am both competent and willing to continue serving as the named Plaintiff in this class action and PAGA representative action, and to continue to fully represent the interests of the class in the administration of this settlement.

6. I have no known or potential conflicts of interest with any potential class members in this action or with the selected settlement administrator.

7. I am not aware of any other pending action or matter that would have any of its claims extinguished or would otherwise be adversely impacted as a result of this settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 10th day of December, 2024 at La Habra, California.

DocuSigned by:

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 Lucas Lee
 Plaintiff