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10 DAVID FREDERICK BITONTI, JR.,
11 MERRIT LYNN CHASSIE, and the Proposed Class

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **FOR THE COUNTY OF ORANGE**

14 DAVID FREDERICK BITONTI JR. and
15 MERRIT LYNN CHASSIE, individually,
16 and on behalf of others similarly situated,
17 and on behalf of other aggrieved employees
18 pursuant to the Private Attorneys General
19 Act,

20 Plaintiffs,

21 vs.

22 TEEN ROAD TO SAFETY INC., a
23 California corporation; ANDREW
24 WUNDERLICH, an individual; and DOES
25 1 through 50, inclusive,

26 Defendants.

Case No. 30-2023-01333703-CU-OE-CXC

**DECLARATION OF DAVID FREDERICK
BITONTI, JR. IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Hearing Information:

Date: May 15, 2025
Time: 2:00 p.m.
Dept.: CX104
Judge: Hon. Melissa McCormick

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1. I am over the age of 18 years old and a resident of the United States. I have personal knowledge of the matters set forth herein, and if called upon to testify, I could and would do so competently. I make this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement.

3. Between approximately November 2022 to August of 2023, I was employed with Defendant Teen Road to Safety, Inc. as a driving instructor.

5. I understand that as a Class Representative I have an important duty to look out for the best interests of the Class. I understood from the start of considering this case based on my discussions with my lawyer that I would have to take on significant responsibilities and burdens for the benefit of the Class, which could include having my deposition taken to give testimony under oath, that I could face the possibility of subpoenas being issued to former and current employers, and that I may testify in Court for the benefit of not only myself but the other members of the Class. I have had numerous conversations with my attorneys regarding this case in order to provide them with the information and documents that they needed to handle the matter. I answered numerous questions that my attorneys had about the case, reviewed the complaint when it was filed, participated in discussions about mediation and resolution of the matter, and reviewed the settlement agreement.

6. I have taken my responsibility as a Class Representative seriously and will continue to do so. I have learned about the laws relating to the issues in this Action, including laws about minimum wages, overtime, meal breaks and rest breaks.

7. I know of no conflicts between my interests and goals and the interests and goals of

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anyone else in the Class.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed on January 2, 2025, in Orange County, California.



David Frederick Bitonti, Jr.