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8 SUPERIOR COURT OF CALIFORNIA
9 COUNTY OF SAN BERNARDINO

10 ELSA CHAVEZ, et al.,
11 Plaintiffs,

12 v.

13 TLD LOGISTICS SERVICES, INC., and DOES 1
14 to 100,
15 Defendants.

) NO. CIVSB2314330
) CLASS ACTION
)
) DECLARATION OF ELSA CHAVEZ IN
) SUPPORT OF MOTION FOR
) PRELIMINARY APPROVAL
)
) Date: January 7, 2025
) Time: 8:30 a.m.
) Dept: S32
)
)

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19 I, Elsa Chavez, declare the following:

20 1. I am one of the plaintiffs. I have personal knowledge of the facts in this declaration
21 and if called on to testify about the facts I would competently do so.

22 2. I believe the settlement is reasonable and adequate, and is a fair resolution.

23 3. During employment with TLD Logistics Services, Inc., I experienced issues
24 including not being paid properly for all time worked, not receiving compliant meal and
25 rest breaks, not receiving accurate wage statements, and related employment law issues.

26 4. I understood that this case was proceeding as a class and PAGA action and that my
27 duties included representing the class members' interests and actively participating in all
28 aspects of the case.

1 5. Further, I respectfully request the court to provisionally approve the service award
2 for me, since I spent time working on the case and performing services for the class to help
3 obtain the favorable settlement.

4 6. I estimate that I spent about 35 hours engaging in activities to move the case forward
5 including having multiple calls with my attorneys at Frontier Law Center and an in person
6 meeting to discuss my experiences at TLD Logistics Services and participating in the
7 settlement process.

8 7. Also, I put the interests of the class above my own and as a condition of settlement I
9 was required to release all possible individual claims.

10 8. Moreover there were risks in serving as the class representative since there was
11 stress the possibility that I might have difficulty with some businesses in the future.

12 9. I was also aware there was a risk that if the case were lost, I could be responsible for
13 TLD Logistics Services, Inc.'s costs.

14 10. Based on the above, I respectfully request the court to grant the motion for
15 preliminary approval.

16
17 Date: 12/6/2024

Signed by:

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Elsa Chavez