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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF STANISLAUS

ANA ORTEGA, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

AGGRESSIVE TRANSPORT LTD-USA,
a California Corporation; and DOES 1
through 20, inclusive;

Defendants.

Case No.: CV-23-003207
*[Assigned to Hon. John R. Mayne, Dept 21, for
all purposes]*

**DECLARATION OF PLAINTIFF ANA
ORTEGA IN SUPPORT OF MOTION
FOR FINAL APPROVAL**

I, Ana Ortega, state and declare:

1. I am the Plaintiff in the above captioned action and have personal knowledge of all matters stated herein and could competently testify thereto. I make this declaration in support of the motion for final approval of the class action settlement. I believe that the settlement is fair and reasonable and constitutes a fair resolution of the claims alleged.

2. I have no conflicts with the proposed class members and will continue to assist with the litigation and prosecute the case on behalf of the other employees.

3. During my employment with Defendants, there were several issues that concerned me and which I thought did not comply with California law, such as not being paid properly and

1 not getting proper rest breaks. As a result, I retained Lauby, Mankin & Lauby LLP to move
2 forward with a case because I did not think that I or the other employees were being treated
3 correctly.

4 4. After retaining my attorneys, I understood that I had two options: I could pursue
5 my individual case – including claims for wrongful termination (as discussed below), or I could
6 bring a class/representative action and put the interests of the class ahead of my own. The
7 decision of whether to bring my individual claims or to bring a class action put me in a tough
8 spot, because on the one hand, I wanted to hold the company accountable for how they treated
9 me and, on the other hand, I wanted to help other employees that were not paid correctly. And I
10 knew that, if I wanted to bring a class action, I would need to put the interests of the class first
11 to better serve the class. In the end, in the interest of helping all employees that were subjected
12 to the wage violations, I decided to help everyone by bringing a class/representative action.

13 5. Since first initiating this action, I estimate that I have spent at least forty-five (45)
14 hours engaged in activities to benefit the class including. I have assisted my attorneys in numerous
15 ways, including helping to explain and discuss the company's practices and their general practices
16 and procedures, locating and analyzing company documents. These efforts occurred through
17 numerous meetings with Class Counsel, telephone conferences, letters, emails, and text
18 communications. I also assisted in preparation for mediation and helped obtain a positive result
19 for the class. Thereafter, I reviewed the MOU and settlement agreement and discussed the
20 approval process with my attorneys.

21 6. I also believe that the requested service award is fair and reasonable given that I
22 have faced substantial risks and made numerous sacrifices to obtain this class action settlement.

23 7. For example, filing this lawsuit and being a whistleblower was stressful on a day-
24 to-day basis as I have constantly worried about the risk that this could impact my ability to find
25 future jobs. I was worried that filing the case may get me labeled as a whistleblower, resulting in
26 retaliation and difficulty finding work for the rest of my career.

27 8. I believe that request for the \$10,000 service award is justified based on (a) the
28 time I have spent on the case, which resulted in a good settlement for the class, (b) the risks I took

1 in bringing this case, which I believe my ability to find future work will be impacted, and (c) my
2 agreement to waive all of my individual claims in exchange for the requested service award.

3 9. I received notice that I will receive \$920.97 as my individual portion of the class
4 and PAGA settlement.

5 10. I respectfully request that the Court approve this class action settlement. I agreed
6 to set aside my personal interests, and to put the interests of the class ahead or on par with my
7 own. In doing so, and by successfully bringing this case as a class action, I helped to obtain a
8 highly beneficial settlement for the class members.

9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct. Executed on Jul 25, 2025, at Tacoma,
11 Washington.

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13 By: 
14 Ana Ortega (Jul 25, 2025 10:48:26 PDT)
15 Ana Ortega
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