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

ELIZABETH CANDELARIO, individually, on
behalf of all others similarly situated,

Plaintiff,

v.

REDTAILS LOGISTICS COMPANY LLC, a
limited liability company; REDTAILS
LOGISTICS CORPORATION, INC., a
California corporation; and DOES 1 through
10, inclusive,

Defendants.

Case No.: 23STCV15238

CLASS & REPRESENTATIVE ACTION

[Assigned for all purposes to: Hon. Elaine Lu,
Dept. 9]

**DECLARATION OF PLAINTIFF
ELIZABETH CANDELARIO IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

DECLARATION OF PLAINTIFF ELIZABETH CANDELARIO

I, Elizabeth Candelario, declare as follows:

1. I am an adult resident of the State of California, and, if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am a former employee of Redtails Logistics Company LLC and Redtails Logistics Corporation, Inc. (collectively, "Defendants"). I worked for Defendants from approximately April 2021 to approximately October 2022 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to all of Defendants' policies and practices that have been alleged as unlawful in the Class Action Complaint and Private Attorneys General Act ("PAGA") Notice sent to Defendants and the Labor & Workforce Development Agency ("LWDA").

4. I initiated this lawsuit because I was concerned that I was not paid properly for all the hours that I worked, and I was not provided all of my meal and rest breaks.

5. By originating this lawsuit as a class representative, I hoped that I might be able to change Defendants' policies to better protect the working conditions of my co-workers. I also understood that it was my duty as a class representative to represent the best interests of the class, know about the lawsuit, assist my attorneys, and keep updated on the case.

6. I have invested a lot of personal time and energy into this lawsuit. As detailed more fully below, I have spent approximately 40 hours on this case. I made it a priority to be actively involved because I wanted to do everything I can to assist my attorneys in prosecuting this case.

7. Throughout this case, I spent a lot of time on the phone with my attorneys to get updates about the case and provide them with information. For example, during some of the phone

calls, my attorneys and I were able to identify instances when I was not paid correctly. Additionally, leading up to the mediation in August 2024, I had multiple lengthy phone calls with Wilshire Law Firm regarding the claims at issue and what was to transpire at the mediation.

8. Throughout the case, I also spent time looking for documents relevant to the case to send to my attorneys. I spent numerous hours looking for these documents, including when I first contacted my attorneys, before my attorneys filed the case, and before my case was mediated. I also spent time reviewing legal documents in this case, including the retainer and settlement agreement and discussed, in detail, the terms with my attorneys.

9. Additionally, I made myself fully available on the day of mediation and was in continuous contact with my attorneys to assist with any questions or issues that may have arisen.

10. I believe the settlement is a good settlement and I would recommend that the Court approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad that I had the opportunity to represent the class in this lawsuit and that I was able to recover money through a settlement for the class.

11. I did not make the decision to file a class action lightly. I was concerned by the attention a publicly filed lawsuit, and especially a class action, would attract. My name would be associated with a lawsuit that I filed against my former employer. I am mindful that prospective employers might find out that I sued Defendants. Nevertheless, I felt that important rights were at stake that hurt everyone, and something ought to be done about it.

12. I also understand that there was financial risk in bringing this lawsuit. For example, I knew that if I did not prevail in this lawsuit that I could potentially be responsible for Defendants' attorneys' fees and costs.

13. I understand that the settlement agreement provides a service payment to me of up to \$10,000.00. I believe this amount is fair compensation for my time and effort on this case, for helping to prosecute this case, and the risks with respect to my future employment. In addition, the settlement requires that I enter into a general release, which I understand is broader than the release that will bind other class members. I am receiving no additional compensation to that provided for in the settlement.

14. Based on my involvement in this case and the benefits provided to my former co-workers, I can say I helped stand up for the other workers who were too afraid to say anything to management because they did not want to risk losing their jobs or risk the stigma of suing an employer. I was not afraid to take that risk because I strongly care about helping out my former co-workers.

15. I reviewed, and ultimately signed, the Class Action and PAGA Settlement Agreement in full and my attorneys answered all the questions I had. I believe the settlement terms and allocations are fair, adequate, and reasonable given the strength of the class claims and Defendants' defenses.

16. I have no conflicts of interest with any class member or the Settlement Administrator, Apex Class Action.

17. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

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

Executed on 8/14/2025, at Palmdale, California.

DocuSigned by:

CD8D878985FD435...
 Elizabeth Candelario

Candelario v. Redtails Logistics Company LLC, et al.
23STCV15238

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I, Rebecca Padilla, state that I am employed in the aforesaid County, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 660 S. Figueroa St, Sky Lobby, Los Angeles, California 90017. My electronic service address is rebecca.padilla@wilshirelawfirm.com.

On August 14, 2025, I served the foregoing **DECLARATION OF PLAINTIFF ELIZABETH CANDELARIO IN SUPPORT OF PLAINTIFF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**, on the interested parties by placing a true copy thereof, enclosed in a sealed envelope by following one of the methods of service as follows:

Tim L. Johnson (SBN 265794)
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Attorneys for Defendant

(X) **BY UPLOAD:** I hereby certify that the documents were uploaded by my office to the State of California Labor and Workforce Development Agency Online Filing Site.

(X) **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed above via third-party cloud service **CASEANYWHERE**.

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

Executed on **August 14, 2025**, at Los Angeles, California.

Rebecca Padilla