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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SAN BERNARDINO**

LISA CHILDRESS and JUSTIN AARON
 HEARD, on behalf of themselves and all
 others similarly situated,

Plaintiff,

vs.

FORD MOTOR COMPANY; and DOES 1
 through 100, Inclusive,

Defendants.

Case No.: CIVSB2324555

CLASS ACTION

*Assigned for All Purposes to Hon. Thomas S.
 Garza, Dept. S27*

**DECLARATION OF JUSTIN AARON
 HEARD IN SUPPORT OF PLAINTIFFS'
 UNOPPOSED MOTION FOR
 PRELIMINARY APPROVAL OF CLASS
 ACTION SETTLEMENT**

Date: April 8, 2026
 Time: 8:30AM
 Dept.: S27

Original Complaint Filed: October 3, 2023
 Trial Date: None Set

DECLARATION OF JUSTIN AARON HEARD

I, Justin Aaron Heard, declare:

1. I am over the age of eighteen and submit this Declaration in support of the Motion for Preliminary Approval of the Class Action Settlement Agreement (“Settlement Agreement”) entered into between me, on behalf of myself and other similarly situated, the general public, and aggrieved employees, and Defendant Ford Motion Company (hereinafter Defendant). I understand that I am submitting this Declaration in support of preliminary Settlement approval in this action and my requested Enhancement Award of up to \$10,000.00. I have personal knowledge of the facts herein, and if called as a witness I could and would competently testify to them.

2. I am currently a resident of California, and I was employed by Defendant during the relevant period as an hourly employee from August of 2022 until November of 2022. During my employment with Defendant, I was employed as an Order Selector. From my experience, and the documents and information I have reviewed from this action, I believe Defendant’s policies are or were uniformly applied to all employees of Defendant in California. I believe I have been similarly situated with the other Class Members as they have been defined in the Settlement Agreement.

3. I understand that I am asking to be approved to serve as the Class Representative for the Settlement Class in this action, which I understand is defined as all individuals employed by Defendant as all current and former non-exempt, hourly employees who worked for Ford in California at any time from July 20, 2019, through October 21, 2025. I also understand that I am serving as the representative plaintiff on behalf of other similarly situated and aggrieved employees in California in connection with the class action and representative claims.

4. I retained the law firm of D.Law, Inc. to represent me in this class action lawsuit against Defendant for the alleged practices and violations as now stated in the operative Consolidated First Amended Complaint (“FAC”), on file with this Court. I had originally filed a class and representative action complaint, alleging the same wage-and-hour violations in San Joaquin County Superior Court. The case was later removed to the United States District Court, Eastern District.

1 5. This class action and the operative Complaint resulted from multiple conversations
2 I had with my attorneys and their staff regarding Defendant's policies and practices. I also
3 understand that the operative Complaint has alleged, among other things, that Defendant exerted
4 pressure and job production demands on me and the Class Members that required us to work off
5 the clock for substantially more hours than those we were scheduled to work, and Defendant failed
6 to pay us for all our hours worked or failed to pay us at the required rates of pay. I further
7 understand we have alleged that Defendant failed to provide us with meal periods and rest breaks
8 as required under California law. Additionally, the consolidated First Amended Complaint alleges
9 that Defendant failed reimburse me and Class Members for the use of our cellular phones for work
10 purposes, did not provide us with compliant wage statements, and failed to pay us timely wages
11 upon separation of employment.

12 6. I believe that I am similarly situated to all other Class Members and aggrieved
13 employees who worked for Defendant during the Class Period and who were similarly affected by
14 Defendant's policies and practices. I believe my claims against Defendant are typical of the other
15 Class Members, as the claims asserted in the operative Complaint and are also shared by the other
16 Class Members.

17 7. From the beginning of my involvement in this case and prior to filing the initial
18 Complaint, my attorneys informed me about what it meant to be a Class Representative. I
19 understood that I was expected to represent the other employees' interests, placing them ahead of
20 my own. I signed an acknowledgment of my duties as a Class Representative at the outset of this
21 action. I understood and believed the way that Defendant failed to pay me for my hours worked
22 was the same as the way it failed to pay all other employees who worked for Defendant. I am
23 happy that I was able to bring a lawsuit as a class representative to try and obtain the unpaid wages
24 and other compensation for myself, but also for my fellow employees like me who had not been
25 paid for all their hours worked or provided all their required breaks.

26 8. I believe that my interests have been and continue to be aligned with all Class
27 Members, and I have been and am willing to continue to pursue the Class Members' claims
28 vigorously on our collective behalf. As a result, I believe I do not have any interests that are

adverse to the interests of the Class Members.

9. I understood it was my responsibility to actively participate in the lawsuit to safeguard the interests of other Class Members and to ensure that my interests were not in conflict with those of the other employees. I did so to the best of my ability, and I believe I have maintained the best interests of the Class Members. I have actively participated in this litigation and have been updated on the progress of the case. I have provided documents to Class Counsel in support of the class claims and spent many hours discussing my claims and information regarding my employment by Defendant. I have also invested significant time and efforts in performing my duties on behalf of the Class, including during the initial complaint drafting process, in response to informal discovery before mediation, speaking with Class counsel about other witnesses and answering questions in connection with the mediation and ongoing settlement negotiations, and now throughout the preliminary and final Settlement approval process.

10. I have spent time communicating with Class Counsel to receive answers to my questions or updates on the case progression. I estimate I have devoted approximately at least **40 hours** of my time to this action and vigorously representing the interests of the Settlement Class, including by performing the following:

- a. Researching the issues and claims I could bring against Defendant and talking to my attorneys about initiating this action;
- b. Being interviewed in detail by my counsel regarding the working conditions we operated under for Defendant, and particularly my experiences and the policies and practices that applied to my employment and the employment of the other similarly situated employees;
- c. Searching for and gathering relevant documents in my possession and providing them to my attorneys, and reviewing all documents produced by Defendant;
- d. Speaking with and informing my attorneys of the identities of potential witnesses and Class Members and responding to questions from Class Members and counsel and from Defendant in discovery in preparation for mediation;
- e. Preparing for the mediation session and reviewing settlement-related documents and working with counsel to execute the final version of the Settlement Agreement. I

have also worked with counsel in connection with the motion for preliminary approval of the Settlement Agreement in drafting this Declaration and will also do so as necessary in connection with final approval; and

f. Regularly receiving and responding to correspondence and phone calls from my attorneys regarding the claims and case status and then the Settlement and other related documents.

11. I have chosen to serve as a class representative despite my concerns about how my role in this class action may adversely affect my prospects for future employment given that this class action and the settlement is public information accessible by prospective employers.

12. I took a huge risk by coming forward to help with this class action. If I had lost the case and also been ordered to pay Defendant's litigation costs, it would have been financially devastating to me.

13. I have reviewed with my counsel the Settlement Agreement we have negotiated with Defendant in this action on behalf of the Class Members. I agreed to the terms because I believe the Settlement is fair and reasonable. I understand that once the Court grants preliminary approval of the Settlement and to me serving as the Class Representative, the action will proceed with Settlement administration and then the final approval process.

14. My opinion about the fairness and adequacy of the settlement in the case is not based on any potential payment. I also believe this amount is fair and justified because it is in consideration for a full general release, one that is much broader than the limited claims release for all Class Members. I was willing to agree to my broader release because it helped the parties agree to the Settlement, which I believe is an excellent result for the Class I have committed to represent.

15. I have not yet received any consideration or promises that are different than any of the other Class Members. In my opinion, the requested Enhancement Award of \$10,000.00 is fair and reasonable given the risks I have taken, the tasks I have performed, the time I have invested, and the real benefit which the Class Members will receive from this class action. In fact, I believe the Settlement has resulted in a good benefit for the Class Members.

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Executed this 18th day of November 2025, at 11/18/2025, California.

DocuSigned by:

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Justin Aaron Heard