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Attorneys for Plaintiff and the proposed class

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

EDGAR ESTRADA an individual, on behalf
of himself and others similarly situated

PLAINTIFF,

v.

UNITED AUTO AND TRUCK, INC.; and
DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. 23STCV18569

[Case Assigned for All Purposes to Hon.
Samantha P. Jessner in Dept. 7]

**DECLARATION OF EDGAR ESTRADA IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS SETTLEMENT**

Date: February 11, 2025

Time: 10:00 AM

Dept.: 7

Complaint Filed: August 4, 2023

Trial Date: None Set

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I, Edgar Estrada, state and declare as follows:

1. I am a competent adult, over the age of eighteen and the Class Representative Plaintiffs in the matter of EDGAR ESTRADA, an individual, on behalf of himself and others similarly situated v. United Auto and Truck, Inc.; and DOES 1 thru 50, inclusive, Los Angeles County Superior Court, Case No. 23STCV18569. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto. I am making this sworn declaration in support of my claims and the claim of my co-workers, and in support of my qualifications as Class Representative. If called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I worked as a cook for United Auto and Truck, Inc. (“Defendant” or “United Auto”).

3. In my role as a mechanic, I did not receive all wages and/or overtime, did not receive compliant meal and rest breaks, was not reimbursed for business-related expenses, did not receive accurate itemized wages statements, and was not paid all wages due at the time of my termination/resignation.

4. I have spent significant time throughout this class action working with Class Counsel. Before filing this action, in August 2023, I researched and identified Counsel that I believed could best represent the interests of the Class Members. I also assisted the attorneys with investigation and gathering of information including discussing my work experience and the experience of others that I had observed while working for United Auto and provided all relevant employment documents in my possession. I also participated in reviewing and verifying discovery responses. I actively participated in the discussions with the Class Counsel and shared my knowledge and insights in order to help the Class obtain a favorable settlement.

5. Although I did not keep contemporaneous time records, I estimate I spent approximately 10-12 hours on these activities over the last two years.

6. Throughout the entirety of this litigation, I have maintained regular contact with Class Counsel and assisted in any way possible by providing information and making myself

1 available as needed.

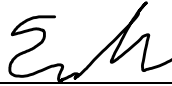
2 7. I was aware that by helping to initiate this lawsuit, my name would become known
3 and it was possible that my involvement in this matter could make it more difficult for me to obtain
4 employment in this field. Regardless, I believed it was important to proceed with this matter on
5 my behalf and on behalf of all others who were subject to the same problems during their
6 employment with United Auto.

7 8. Based upon my participation in this case, I understand the merits of this settlement
8 and I strongly support the settlement and believe it is fair and reasonable, and in the best interest
9 of the class. I believe this Settlement will benefit the Class.

10 9. It is my opinion that a fair and adequate Class enhancement for me as a Class
11 Representative is \$5,000.00. I believe that it is fair and reasonable in view of all of the work I have
12 performed in my role as a Class Representative. As Class Representative, I actively participated
13 in all stages of the litigation as detailed above and have always maintained the best interest of the
14 Class while performing my Class Representative duties.

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

17 Executed this 3 day of Oct, 2025 at Sylmar,
18 California. (City)

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21 _____
22 Edgar Estrada
23 Declarant
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(PROOF OF SERVICE)

[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

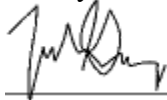
On October 8, 2025, I served all interested parties in this action the following documents described as: **DECLARATION OF EDGAR ESTRADA IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof in a sealed envelope addressed as stated on the attached service list:

Lonnie D. Giamela
lgiamela@fisherphillips.com
Lirit King
lking@fisherphillips.com
FISHER & PHILLIPS LLP
444 South Flower Street, Suite 1500
Los Angeles, California, 90012

[XX] (BY ELECTRONIC MAIL THROUGH CASE ANYWHERE): On interested parties set forth on the attached service list.

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 8, 2025, at West Hollywood, California.



Taylor Gregg