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

ALFONSO ALMARAZ, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

WORLD OIL CORP., a California Corporation;
and DOES 1 through 100,

Defendants.

Case No.: 23STCV18296

*[Assigned for all purposes to the Hon. David
S. Cunningham III, Dept. SS-11]*

**DECLARATION OF PLAINTIFF
ALFONSO ALMARAZ IN SUPPORT OF
APPROVAL OF CLASS ACTION
SETTLEMENT**

Action Filed: August 2, 2023
Trial Date: None Set

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I, Alfonso Almaraz, declare as follows:

1. I am an individual over the age of 18 and the named plaintiff in this matter. This declaration is submitted in support of approval of the proposed class action settlement reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for with Defendant Pan Pacific Petroleum Company, Inc (“Pan Pacific”) as a non-exempt driver from approximately November 9, 2019, until approximately November 2023.

3. During my employment, I was paid based on the number of loads I delivered, not based on the number of hours I worked. When I received my pay stubs, they only listed a total and weekly breakdown of my piece-rate wages earned in the prior month. They did not list the number of loads or the rates I was paid for each load. Pan Pacific also provided a separate “piece-rate detail sheet” at the end of each month, which showed my piece-rate wages for each week, but not the number of piece rate units or the applicable rates.

4. My supervisors and dispatchers regularly called me on my personal cell phone throughout my employment. I also had to use my cell phone for driving directions to each destination. However, Pan Pacific did not reimburse me for my monthly cell phone expenses.

5. When I first filed my lawsuit, I understood that it had the chance to benefit Pan Pacific's other workers by helping them recover the money they spent on business expenses and other penalties they were owed. I felt that Pan Pacific was not following the law, and I wanted Pan Pacific to comply with the law and treat their employees fairly. I feel that I have taken on a greater burden than any of the other class members because I have been actively involved in the litigation, and because it is my name that is attached to the lawsuit. Although I was aware of the risks associated with filing a public lawsuit, I chose to move forward with the case anyway. Through my efforts, Pan Pacific has agreed to a settlement that will benefit my coworkers and the other employees at Pan Pacific, and I believe that I should be compensated for carrying the burden of this litigation for the benefit of the other employees.

6. I have been actively involved in this case since before it was even filed. Among other things, I searched for relevant documents for use in the lawsuit, I provided factual information to my attorneys, had various phone calls with my attorneys to discuss the claims in the lawsuit and Pan Pacific's policies and practices, assisted my attorneys to help them prepare for mediation, made myself available during mediation to assist my attorneys and answer factual questions posed by the mediator, reviewed and provided input regarding the settlement in this case, and otherwise assisted my attorneys in moving this case towards resolution. I estimate that I have spent approximately 15 hours in total on these activities.

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 10/10/24, 2024 at bakersfield, California.

Alfonso Almaraz

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