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(Additional Attorneys Listed on the Following Page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

TIMOTHY WILLIAMS; JACKIE SAUCEDO AS SUCCESSOR-IN-INTEREST TO SERGIO SAUCEDO; as individuals, on behalf of themselves and others similarly situated

PLAINTIFFS,

v.

MERCURY AIR CARGO, LLC; and DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. 23STCV21753
(Consolidated with Case No. 23STCV31703)
[Case Assigned for All Purposes to Hon. William F. Highberger in Dept. 10]

DECLARATION OF TIMOTHY WILLIAMS IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT

Date: January 8, 2027
Time: 11:30 AM
Dept.: 10

Complaint Filed: September 11, 2023
TAC Filed: January 6, 2026
Trial Date: None set

The signed document can be validated at https://app.vinesign.com/Verify

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Attorneys for Plaintiff TIMOTHY WILLIAMS, the Proposed Class, and the aggrieved employees

DECLARATION OF TIMOTHY WILLIAMS

I, Timothy Williams, 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 *TIMOTHY WILLIAMS; JACKIE SAUCEDO AS SUCCESSOR-IN-INTEREST TO SERGIO SAUCEDO; as individuals, on behalf of themselves and others similarly situated v. MERCURY AIR CARGO, LLC*; and DOES 1 thru 50, inclusive, Los Angeles County Superior Court, Case No. 23STCV21753. 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 customer service representative for Mercury Air Cargo, LLC ("Defendant").

3. In my role as a customer service representative, Defendant failed to pay all wages and/or overtime, failed to provide compliant meal and rest breaks, failed to reimburse necessary business expenses, failed to issue accurate itemized wage statements, and failed to pay all wages due at the time of resignation/termination.

4. I have spent significant time throughout this class action working with Class Counsel. Before filing this action, in December 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 Defendant and provided all relevant employment documents in my possession. In addition, I made myself available for a full-day mediation on July 11, 2025. While at the Mediation, 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. Though I did not keep contemporaneous time records, I estimate I have spent approximately 15-20 hours on the above activities since 2023.

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 available as needed.

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

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

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

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

Executed this 6 day of November, 2026 at Los Amgeles, California. (City)

Timothy Williams
Declarant

(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 November 9, 2026, I served all interested parties in this action the following documents described as: **DECLARATION OF TIMOTHY WILLIAMS IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

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[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (https://dir.tfaforms.net/315) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[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 November 9, 2026, at West Hollywood, California.

Taylor Gregg