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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF PLACER**

11 FELIPE HERNANDEZ, an aggrieved
12 employee and on behalf of other aggrieved
employees;

13 Plaintiff,

14 vs.
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16 VOLKSWAGEN GROUP OF AMERICA,
INC., a New Jersey corporation; and DOES 1
17 through 50,

18 Defendants.
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Case No.: S-CV-0051588

**DECLARATION OF FELIPE
HERNANDEZ IN SUPPORT OF
MOTION FOR APPROVAL OF PAGA
SETTELEMENT AND ATTORNEY'S
FEES AND COSTS**

(Filed Concurrently with Motion for
Approval of PAGA Settlement, Supporting
Declarations, and [Proposed] Judgment and
Order)

JUDGE: Hon. Christine Dehr
DATE: August 21, 2026
TIME: 8:25 a.m.
DEPT: 1

Action Filed: November 6, 2023
Trial Date: Not Set

1 I, Felipe Hernandez, hereby declare as follows:

2 1. I am an individual over the age of 18 year and the named Plaintiff in the above-
3 captioned matter. This declaration is submitted in support of approval of the proposed class action
4 settlement ("Settlement") reached in this case. I have personal knowledge of the facts contained in
5 this declaration, and if called as a witness, could and would testify as to their accuracy.

6 2. I was employed by Defendant Volkswagen Group of America, Inc. ("Defendant") as
7 an hourly-paid, non-exempt warehouse technician at its parts distribution center in Rockwell,
8 California from approximately 2018 to approximately July 24, 2023. During my employment with
9 Defendant, I was subject to Defendant's wage and hour policies and practices that are at issue in
10 this case.

11 3. Specifically, Defendant rounded my time punches, I received incentive
12 compensation such as VW stipends which were not factored into the regular rate of pay, I
13 sometimes was unable to take compliant meal and rest breaks, and Defendant deducted my wages
14 for purported overpayment without my approval. As a result of the foregoing issues, I believe I
15 received inaccurate wage statements and was not paid all wages when my employment with
16 Defendant ended. I believe other non-exempt employees of Defendant were subject to the same
17 policies and procedures discussed above and that my claims against Defendant for civil penalties
18 are typical of Aggrieved Employees' claims.

19 4. I have been actively involved in this case since I first retained Justice for Workers,
20 P.C. ("JFW") in August 2023. Without waiving the attorney-client privilege, prior to filing this
21 lawsuit, my attorneys explained my role and responsibilities as a PAGA representative, and I
22 understand my responsibilities as a PAGA representative. Since retaining my attorneys, I have had
23 many discussions and meetings with the attorneys and staff at JFW, discussions regarding
24 Defendant's wage and hour practices and my claims in this case, litigation strategy, updates on how
25 the case was proceeding, the Settlement, and how I could help the case and potential Aggrieved
26 Employees. I also gathered and reviewed documents for use in the lawsuit and reviewed relevant
27 documents with my attorneys. I also responded to discovery.

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

3 Executed on July 13, 2026 at Rocklin, California.
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FELIPE HERNANDEZ
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Title	[POR FAVOR FIRME] Declaration of Felipe Hernandez In Support...
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Signed by Felipe Hernandez (1986fher@gmail.com)
IP: 174.208.224.117



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The document has been completed.