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6 Attorneys for Defendants

7 J. VELARDE, INC. d.b.a. CRYSTAL CHRYSLER DODGE JEEP RAM; ROBERT N.

8 LA TORRE, INC. d.b.a. TORRE NISSAN; GEOVEL INC. d.b.a. I-10 CHRYSLER

9 DODGE JEEP RAM

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 FOR THE COUNTY OF RIVERSIDE - RIVERSIDE HISTORIC COURTHOUSE

12 SERGIO HUIZAR, as an individual and
13 on behalf of all others similarly situated,

14 Plaintiff,

15 v.

16 J. VELARDE, INC. d.b.a. CRYSTAL
17 CHRYSLER DODGE JEEP RAM, a
18 California Corporation; ROBERT N. LA
19 TORRE, INC. d.b.a. TORRE NISSAN, a
20 California Corporation; GEOVEL INC.
21 d.b.a. I-10 CHRYSLER DODGE JEEP
22 RAM, a California Corporation; and
23 DOES 1 through 100,

24 Defendants.

CASE NO.: CVRI2306697

[Unlimited Jurisdiction]

*Assigned for all purposes to the
Honorable Harold Hopp, Dept. 1*

**DECLARATION OF SPENCER W.
WALDRON IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL**

DATE: July 10, 2026

TIME: 8:30 a.m.

Complaint Filed: December 13, 2023

Trial Date: Not Set

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1. I am a partner with Fisher & Phillips LLP, attorneys of record for J. VELARDE, INC. d.b.a. CRYSTAL CHRYSLER DODGE JEEP RAM; ROBERT N. LA TORRE, INC. d.b.a. TORRE NISSAN; GEOVEL INC. d.b.a. I-10 CHRYSLER DODGE JEEP RAM (“Defendants”).

2. I am not aware of any other class, representative, or other collective actions in any other courts or jurisdiction that asserts claims similar to those asserted in this action on behalf of a class or group of individuals who would also be members of the class defined in this action. I made a reasonable inquiry of other members of my law firm and they are not aware of any such similar claims.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration is executed on June 12, 2026, at Irvine, California.


SPENCER W. WALDRON