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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SAN DIEGO**

DIANA ARAGON and CHARLES ARAGON,
 individually, and on behalf of all others
 similarly situated,

Plaintiffs,

v.

SAN DIEGO FREE RIDE, LLC DBA CHULA
 VISTA COMMUNITY SHUTTLE, a California
 limited liability company; CIRCUIT TRANSIT
 INC. DBA THE FREE RIDE, a Florida
 corporation; TAG-A-LONG SAN DIEGO, LLC
 DBA CIRCUIT DBA FRED SAN DIEGO, a
 California limited liability company; RIDE
 CIRCUIT, an unknown entity; and DOES 1
 through 10, inclusive,

Defendants.

Case No.: 37-2023-00044086-CU-OE-CTL

*[Assigned for All Purposes to the Hon.
 Marcella O. McLaughlin, Dept. C-72]*

**DECLARATION OF CHARLES
 ARAGON IN SUPPORT OF
 PLAINTIFFS' MOTION FOR FINAL
 APPROVAL OF CLASS ACTION AND
 PAGA SETTLEMENT**

Preliminary Approval Hearing:

Date: February 20, 2026

Time: 9:30 a.m.

Dept: C-72

Action Filed: October 11, 2023

DECLARATION OF CHARLES ARAGON

I, Charles Aragon, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness. I submit this declaration in support of my Motion for Final Approval of Class Action and PAGA Settlement.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

2. When I decided to become involved in this lawsuit as a class representative on behalf of other employees of San Diego Free Ride, LLC (“San Diego Free Ride”) and as a private attorney general for the State of California, I understood that I was not only seeking unpaid wages and penalties on behalf of myself, but also for other employees who worked for San Diego Free Ride, and that by doing so, I would be delaying more immediate recovery available to me through the Labor Commissioner’s office.

3. I was also made aware that being a class representative and private attorney general in an action filed on behalf of others would subject me to a stigma that is sometimes associated with those who bring these kinds of lawsuits. I was aware that, as a class representative and private attorney general, I might be responsible for some or all of San Diego Free Ride’s legal costs if the case was not successfully concluded. Even with knowledge of these risks, I was willing to go forward and to act on behalf of the other employees and the State of California, but I was nervous about losing and having a judgment filed against me for costs or losing job opportunities in the future.

4. I understood that there were risks involved in class and representative action lawsuits. I understood that the lawsuit could continue for several years and require my services and attention throughout the entire length of the lawsuit. I learned that even if we won at trial, the case could be further delayed by appeals.

Notoriety and Personal Difficulties Encountered

5. As a named plaintiff, I am the face of the litigation. Additionally, the class notice that was mailed in this case was sent to approximately 167 current and former employees of San Diego Free Ride. The notice informed all these employees that I filed a class and representative action against San Diego Free Ride. Exposing myself to this kind of publicity creates a risk for my future

1 career prospects, since current and former employees of San Diego Free Ride may move to different
2 companies within the transportation industry or may know people at other companies within the
3 transportation industry who may not wish to hire someone who sued his employer.

4 **Amount of Time and Effort Spent and Duration of the Litigation**

5 6. I have spent a substantial amount of time and effort on this litigation. My work on
6 this case has included, among other things, discussing my claims with my attorneys, assisting my
7 attorneys prepare for mediation, and participating in settlement discussions. After mediation, I
8 remained actively involved by reviewing the settlement papers and regularly contacted my counsel
9 for updates. I estimate that since I retained my counsel in June 2023, I have spent approximately 25
10 hours on the activities described above.

11 **Personal Benefit Received as a Result of the Litigation**

12 7. Absent the requested service payment, the personal benefit I will receive from this
13 settlement is the same as all other employees.

14 8. I declare under penalty of perjury under the laws of the State of California that
15 the foregoing is true and correct. Executed on 1/28/2026, at San Diego,
16 California.

17 Signed by:

18 *Charles Aragon*

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20 Charles Aragon