

Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Daniel Bass (SBN 287466)
Brian J. St. John (SBN 304112)
LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE**

SHANE UNDERWOOD, individually, and
on behalf of other members of the general
public similarly situated;

Plaintiff,

vs.

VOLVO GROUP NORTH AMERICA,
INC., a Delaware corporation; SABA
HOLDING COMPANY, LLC DBA
VOLVO CONSTRUCTION &
EQUIPMENT SERVICES, a Delaware
limited liability company; and DOES 1
through 100, inclusive,

Defendants.

Case No. CVRI2401288 (Lead Case)
Consolidated Case No(s): CVRI2401287

Honorable Harold Hopp
Department 1

CLASS ACTION

PROOF OF SERVICE

Complaint Filed: March 8, 2024
Jury Trial Date: None Set

PROOF OF SERVICE

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 and not a party to the within action. My business address is 450 North Brand Blvd, Suite 900, Glendale, California 91203.

On August 19, 2026, I served the foregoing document(s) described as:

- **PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT, ATTORNEYS' FEES AND COSTS, AND GENERAL RELEASE FEE; MEMORANDUM OF POINTS AND AUTHORITIES**
- **DECLARATION OF DANIEL BASS IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT, ATTORNEYS' FEES AND COSTS, AND GENERAL RELEASE FEE**
- **DECLARATION OF PLAINTIFF SHANE UNDERWOOD IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**
- **DECLARATION OF NICK CASTRO OF ILYM GROUP, INC., IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**
- **[PROPOSED] FINAL APPROVAL ORDER AND JUDGMENT**
- **PROOF OF SERVICE**

on interested parties in this action by Electronic Service as follows:

Tiffany Brosnan (tbrosnan@swlaw.com)

Anne Dwyer (adwyer@swlaw.com)

SNELL & WILMER

600 Anton Blvd Ste 1400,
Costa Mesa, CA 92626-7689

Additional email: Shaun Rippe (srippe@swlaw.com)

Attorneys for Defendants

[X] BY E-MAIL

The above-referenced document was transmitted to the person(s) at the e-mail addresses listed herein at their most recent known e-mail address or e-mail of record in this action. I did not receive, within reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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State of California, Labor & Workforce Development Agency Web URL:
<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

[X] BY ONLINE SUBMISSION

The foregoing documents were transmitted to the California Labor and Workforce Development Agency through the online system established for the submission of notices and documents, in conformity with California Labor Code section 2699(l). I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

[X] STATE

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

Executed on August 19, 2026, at Glendale, California.



Isabel Yang