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**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
consolidated with CVRI2401287

Honorable Harold W. Hopp
Department 1

CLASS ACTION

**DECLARATION OF PLAINTIFF SHANE
UNDERWOOD IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: September 11, 2026
Time: 8:30 a.m.
Department: 1

Complaint Filed: March 8, 2024

DECLARATION OF SHANE UNDERWOOD

I, Shane Underwood, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case *Shane Underwood v. Volvo Group North America, Inc. et al.*, Riverside County Superior Court Case No. CVRI2401288, as well as the consolidated case entitled *Shane Underwood v. Volvo Group North America, Inc. et al.*, Riverside County Superior Court Case No. CVRI2401287. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Saba Holding Company, LLC dba Volvo Construction & Equipment Services. ("Defendant") from approximately July 11, 2023 to approximately August 24, 2023 as an hourly-paid Shop Mechanic. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers for Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers for Justice, PC discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I

1 had obtained.

2 4. Throughout this matter, I was available to answer any questions my attorneys had,
3 and available to speak and meet with my attorneys whenever they needed me. I responded to them
4 as quickly as possible and gave them as much information and identified as many documents as I
5 could. I spent time speaking with my attorneys about the case, identifying potential witnesses,
6 providing my attorneys with documents and information concerning the case, and also describing
7 policies, practices, and procedures of Defendant.

8 5. As far as the settlement is concerned, I was available to review documents and
9 answer any questions my attorneys had. I reviewed the settlement agreement and discussed the
10 potential settlement with my attorneys before signing the settlement agreement.

11 6. I think my efforts helped to get the result obtained in this matter, and as a potential
12 class and PAGA representative, I respectfully request that the Court award me a general release
13 fee for my efforts in pursuing and participating in this matter, as well as my broader release of
14 claims. Taking into consideration the time that I have dedicated to this matter, I believe that this
15 amount is reasonable.

16 7. I am not related to anyone associated with Lawyers for Justice, PC. In addition, I
17 have no relationship or affiliation with the proposed *cy pres* recipient Riverside Legal Aid.

18 8. I have not entered into any undisclosed agreements, nor have I received any
19 undisclosed compensation in this matter. The only compensation I will receive is whatever amount
20 the Court awards as general release fee, as well as my share of the settlement as a class member
21 and aggrieved employee.

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

08/18/2026

24 Executed this ____ day of August 2026, at Lake Elsinore, California.

25 
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26 Shane Underwood