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Attorneys for Plaintiff
DAVID GOMEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

DAVID GOMEZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

STRAUB DISTRIBUTING COMPANY,
LTD, a California limited partnership; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 30-2024-01376270-CU-OE-CXC

*[Assigned to the Hon. Layne H. Melzer, Dept.
CX102]*

**DECLARATION OF PLAINTIFF DAVID
GOMEZ IN SUPPORT OF PLAINTIFF'S
MOTION FOR SETTLEMENT
APPROVAL OF CLAIMS BROUGHT
UNDER THE PRIVATE ATTORNEYS
GENERAL ACT AND REASONABLE
ATTORNEYS' FEES, COSTS, AND
ENHANCEMENT AWARD**

Date: October 8, 2026

Time: 2:00 p.m.

Dept.: CX102

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I, DAVID GOMEZ, declare as follows:

1. I am an individual over the age of 18 and the named plaintiff in this matter. This declaration is submitted in support of approval of the proposed Private Attorneys General Act (“PAGA”) settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I have been employed by Defendant Straub Distributing Company, Ltd., since approximately May 2022 as a Commercial Delivery Driver. While working for Defendant, I was subject to Defendant's wage and hour policies and practices.

3. I do not believe I received accurate and complete wage statements because the wage statements issued to me by Defendant failed to include the units and rates for the “Dimes” line item.

4. I retained Lidman Law, APC and Haines Law Group, APC to represent me in my Labor Code violation claims against Defendant.

5. At the time of filing this lawsuit, I understood that this lawsuit had the chance to benefit my former co-workers and current employees of Defendant by helping them recover unpaid penalties for various Labor Code violations, including, failure to provide accurate itemized wage statements, failure to pay all wages at least twice a month, and failure to maintain accurate records. As the named Plaintiff I knew that I would be taking on certain risks that the other employees wouldn't have to bear. I knew that there was a risk that I could be liable for Defendant's costs if we lost the case. I accepted these risks because I wanted Defendant to compensate its former employees and to fix its pay practices. Even though I understood that joining a lawsuit is a public record and could stigmatize me and may affect my future employability because employers do not like to hire employees who have filed lawsuits against their prior employers, I accepted that burden for the benefit of other employees of Defendant. Indeed, if I had not sought legal representation to enforce California's labor laws, I do not believe my former co-workers of Defendant and California's Labor and Workforce Development Agency

1 (“LWDA”), which I understand receives a portion of the proposed settlement, would receive any
2 of these funds. Without counsel and my assistance, I do not believe we would have gotten the
3 proposed settlement.

4 6. After the lawsuit was filed, I continued to work closely with my lawyers,
5 including without limitation, having my deposition taken. I worked with my lawyers to prepare
6 for the mediation and was available that day for any questions that arose. I spent time discussing
7 the proposed settlement with my attorneys. I wanted to understand everything before I signed
8 it. I believed I represented the aggrieved employees and the LWDA to the best of my ability and
9 put the interests of the aggrieved employees ahead of my own. I estimate that I have spent 15-
10 20 hours on this case.

11 7. As part of the proposed Settlement, I have agreed to release Defendant and
12 Released Parties from any and all of the PAGA Released Claims that arose during the PAGA
13 Period.

14 8. I understand that my attorneys will request that the Court award me an
15 enhancement award of \$2,500.00 for my service and efforts on the case. This proposed \$2,500.00
16 enhancement award is not contingent upon me supporting the proposed Settlement.

17 I declare under penalty of perjury under the laws of the United States and state of
18 California that the foregoing is true and correct. Executed on June 18, 2026 at
19 Rowland Heights, California.

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David Gomez (Jun 18, 2026 23:08:50 PDT)

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