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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

MANPREET SINGH and ANDRE
STOKES, individually, on a representative
basis, and on behalf of all others similarly
situated;

Plaintiffs,

vs.

HSD TRUCKING, INC., a California
Corporation; PARDEEP SINGH, an
Individual; SARBJIT DHUDWAL, an
Individual; and DOES 3 through 20,
inclusive;

Defendants.

Case No.: CIVSB2403148
*[Assigned to Hon. Christian Towns, Dept S26,
for all purposes]*

**DECLARATION OF PLAINTIFF ANDRE
STOKES IN SUPPORT OF MOTION FOR
FINAL APPROVAL**

I, Andre Stokes, state and declare:

1. I am a Plaintiff in the above captioned action and have personal knowledge of all matters stated herein and could competently testify thereto. I make this declaration in support of the motion for final approval of the class action settlement. I believe that the settlement is fair and reasonable and constitutes a fair resolution of the claims alleged.

2. During my employment with Defendants, I thought there were issues with my pay and other aspects of my employment. Because of these issues, I started researching California law and contacted attorneys regarding how I was treated.

1 3. I then contacted my attorneys and understood that I had two options: (1) I could
2 this case as a class action, but I would have to put the interests of all employees ahead of my
3 own, or (2) I could bring my individual case and claims and attempt to maximize an individual
4 recovery. This decision was very difficult because I wanted to maximize my individual
5 recovery, but I also wanted to help everyone else that was wronged by the company. And, if I
6 brought a class action, I was worried that I might get labeled as a whistleblower, which might
7 make it hard to find a job in the future. In the end, I decided that – despite the risks – it was
8 important to bring these claims as a class action to hold the company accountable for how they
9 treated their employees.

10 4. I respectfully request that the Court approve the agreed-upon service award for
11 the following reasons.

12 5. First, I have spent substantial time working on this case – at least 50 hours spent
13 on time and tasks to benefit the class. I have actively participated in this litigation and assisted
14 my attorneys in numerous ways, including helping to explain the company’s pay practices and
15 their general practices and procedures, locating and analyzing company documents, and
16 communicating with other class members. These efforts occurred through numerous telephone
17 conferences, letters, emails, and text communications. I also assisted in preparation for mediation
18 and helped obtain a positive result for the class.

19 6. Second, by bringing this case as a class action, I undertook significant risks and
20 stresses at a high emotional cost without any guarantee of success. For example, filing this
21 lawsuit and being a whistle blower was stressful on a day-to-day basis as I have constantly
22 worried about the risk that this case could impact my ability to find future jobs. And this
23 stress/risk lasted for the entire case, and I’m worried it may make it hard to find a job in the
24 future since the case information is all available online.

25 7. Third, I agreed to set aside my personal interests and to put the interests of the
26 class ahead of my own. In doing so, and by successfully bringing this case as a class action, I
27 helped to obtain a highly beneficial settlement for the class members.

28 8. Fourth, bringing this case also came with a major financial risk because, if I lost

1 the case, I would be required to pay the company's costs, which could be over \$10,000, and there
2 was a chance they could try to make me pay their attorneys' fees as well.

3 9. Therefore, I respectfully request that the Court award the full requested service
4 award since that amount is justified based on the facts above.

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct. Executed on Dec 3, 2025, at San Bernardino, California.

7 By: Andre Stokes
8 Andre Stokes (Dec 3, 2025 13:25:21 PST)
9 Andre Stokes
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