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

STEVEN SCOTT, VICTOR AUGUST,
individually, and on behalf of other members of
the general public similarly situated and on
behalf of other aggrieved employees pursuant to
the California Private Attorneys General Act;

Plaintiffs,

vs.

PERFORMANCE FOOD GROUP, INC., a
Colorado corporation; CORE-MARK
INTERNATIONAL, INC., a Delaware
corporation; PERFORMANCE FOODSERVICE,
an unknown business entity; CME TRANSCO,
LLC, a Delaware corporation; and DOES 1
through 100, inclusive,

Defendants.
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Case No. CV2024-0729

Honorable Timothy L. Fall
Department 11

**DECLARATION OF RYAN SLINGER IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: March 10, 2026
Time: 9:00 a.m.
Dept.: 11

Complaint Filed: March 19, 2024
FAC Filed: October 14, 2025
Trial Date: None Set

DECLARATION OF RYAN SLINGER

I, Ryan Slinger, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Steven Scott (“Plaintiff Scott”) in the above-captioned action (“*Scott* Class Action”) and the action entitled *Scott v. Performance Food Group, Inc.*, Yolo County Superior Court Case No. CV2024-0730 (“*Scott* PAGA Action”). The *Scott* Class Action and *Scott* PAGA Action, in addition to, the actions entitled *August v. CME Transco, LLC* Sacramento County Superior Court Case No. 24CV005326 (“*August* Class Action”) and *August v. CME Transco, LLC* Sacramento County Superior Court Case No. 24CV009997 (“*August* PAGA Action”) are collectively referred to as the “Actions”. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and if called as a witness, I could and would competently testify thereto.

LITIGATION AND REPRESENTATIVE AND CLASS ACTION EXPERIENCE

2. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is attorney of record in over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act (“PAGA”) representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wage, provision of meal and rest breaks and/or premium wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. During a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

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3. Edwin Aiwazian is the Managing Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice law from the California State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested motion practice in approximately sixteen (16) cases in the last decade and litigated over 1,000 class action or representative action cases.

4. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He received his Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. From

1 approximately August 2008 to approximately December 2008, he served as a Judicial Extern to the
2 Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit. He
3 was admitted to practice law in California in 2010. He is admitted to practice before all courts of the
4 State of California and all United States District Courts in the State of California. He has worked on
5 many wage-and-hour class action and representative action cases, taking the lead in taking and
6 defending depositions, arguing motions, and attending mediations. He has played an integral role in
7 preparing matters for class certification, including and not limited to, successful certification of a
8 class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No. BC424012),
9 *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No. BC478769), and
10 *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477). Under his
11 supervision, dozens of class action or representative action cases have resulted in settlements that
12 have been granted court approval. He has handled over one hundred and fifty (150) mediations and
13 worked on over two hundred and fifty (250) class action or representative action cases which have
14 resulted in settlement.

15 5. Joanna Ghosh is a Managing Member of Lawyers for Justice, PC. She received a
16 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science
17 degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown
18 University Law Center in 2010. She is admitted to practice in California (since 2010) and in New
19 York (since 2013) and is also admitted to practice in all U.S. District Courts in California, the U.S.
20 Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken
21 and defended dozens of depositions and successfully handled motion practice in class action cases
22 regarding discovery (including and not limited to, regarding class contact information), class
23 certification (both contested class certification and stipulated class certification), arbitration
24 agreements, coordination, intervention. She has successfully handled briefing and oral argument on
25 appeal, and obtained notable decisions regarding the Private Attorneys General Act and employer
26 efforts to compel arbitration of such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply*,
27 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24, 2017), cert. denied
28 (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th175 (2019). She has significant

1 experience with class actions, including and not limited to working on cases to obtain class
2 certification through contested motion practice and working on cases in the post-certification stage
3 (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation
4 in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600
5 individuals). She has extensive experience with class action and/or representative action settlements,
6 and has handled this process in over five hundred (500) cases. Under her, Edwin Aiwasian, and Arby
7 Aiwasian's supervision, Lawyers *for* Justice, PC has handled the class certification and court
8 approval process for hundreds of class action and/or representative action matters that have
9 successfully resolved. Joanna Ghosh is a member of the California Employment Lawyers
10 Association and, on several occasions, has been a speaker regarding topics in wage and hour law at
11 the organization's continuing legal education events.

12 6. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts degree
13 from the University of Michigan in 2020, and I earned my Juris Doctor degree from Loyola Law
14 School in 2023. I was admitted to practice law in California in 2023. I am admitted to practice before
15 all courts of the State of California. I have worked on many wage-and-hour class action and PAGA
16 representative cases, and my work on these cases has included preparing pleadings and motions,
17 making court appearances, drafting and finalizing settlement agreements.

18 **BASIC INFORMATION ABOUT THE CASES AND REACHING THE SETTLEMENT**

19 7. Lawyers *for* Justice, PC has been actively engaged in this litigation from the inception
20 of the *Scott* Class Action and *Scott* PAGA Action, which were filed on March 19, 2024. Lawyers
21 *for* Justice, PC has fully and actively participated in the litigation process throughout the pendency
22 of the *Scott* Class Action and *Scott* PAGA Action. Lawyers *for* Justice, PC joined forces with other
23 plaintiff's counsel, Mara Law Firm, PC, to represent Plaintiffs Steven Scott and Victor August
24 (together, the "Plaintiffs") (together, the firms are referred to as "Class Counsel") and the Class
25 Members, PAGA Group Members, and the State of California.

26 8. Before initiating the lawsuit on behalf of Plaintiff Scott, Lawyers *for* Justice, PC
27 conducted extensive investigation and research into the facts and circumstances underlying the
28 pertinent factual and legal issues and applicable law. This required thorough discussions and

1 interviews between attorneys at our firm and Plaintiff Scott, and research into the various legal issues
2 involved in the cases, namely, the current state of the law as it applied to off-the-clock theory, meal
3 and rest periods, unreimbursed business expenses, PAGA representative actions, and wage-and-hour
4 law and enforcement, Plaintiff Scott's claims and damages, and Defendants CME Transco, LLC,
5 and Core-Mark International, Inc. (together, "Defendants") (collectively with Plaintiffs, the
6 "Parties") defenses. After conducting initial investigations, our firm determined that Plaintiff Scott's
7 claims were well-suited for class action and representative treatment owing to what appeared to be
8 a common course of conduct affecting a similarly situated group of current and former California-
9 based truck drivers, driver helpers, and related job classifications employed by Defendants within
10 the State of California, who were not properly compensated for, *inter alia*, all hours worked, non-
11 compliant meal and rest periods, and unreimbursed business expenses.

12 9. Collectively, Class Counsel investigated the veracity, strength, and scope of the
13 claims, and worked on preparing the matters for class certification and trial, prior to reaching the
14 Settlement. These matters have involved extensive and ongoing investigations, research into legal
15 and factual issues, and informal discovery. Class Counsel obtained information, documents, and
16 data in the course of litigation and in connection with mediation and settlement negotiations. Class
17 Counsel reviewed and analyzed a volume of information, documents and data obtained from
18 Plaintiffs, Defendants, and other sources, researched applicable law, and undertook analyses and
19 calculations of the value of claims, damage, and penalties exposure. Counsel for the Parties also met
20 and conferred on numerous occasions, e.g., to discuss issues relating to the pleadings, case
21 management, discovery, and issues relating to the production of information, documents, and data
22 in the course of litigation and in connection with mediation and settlement discussions. Other work
23 that Class Counsel performed included, and was not limited to, case strategy and analysis; drafting,
24 reviewing, and revising the pleadings and motion-related papers; case management; claims
25 assessment and evaluation; and preparing for and attending court proceedings, mediation, and
26 settlement negotiations.

27 10. As outlined herein, the Parties have conducted significant investigations and
28 exchange, review, and analysis of a volume of information, documents, and data obtained from

1 Plaintiffs, Defendants, and other sources during the court of litigating the mater and in connection
2 with mediation and settlement negotiations. The information, documents, and data provided a
3 critical understanding of the nature of the work performed by putative class members and aggrieved
4 employees, as well as Defendants' operations and employment policies, practices, and procedures,
5 and were used in analyzing liability, damages, and penalties valuation issues in connection with all
6 phases of the litigation, and ultimately, in connection with the mediation and settlement negotiation
7 process. Accordingly, sufficient investigation and review of information has taken place in order
8 for the Parties to be sufficiently informed of the nature and extent of the claims, and to enable all
9 parties to fully evaluate the Settlement for its fairness, adequacy, and reasonableness.

10 11. After conducting significant investigation of the facts and law during the prosecution
11 of the matter, counsel for the Parties participated in mediation and extensive settlement negotiations
12 to try to resolve the matter. These efforts included participating in a full-day mediation on April 23,
13 2025, conducted by Mediator Kevin T. Barnes, Esq., a well-respected mediator experienced in
14 mediating complex labor and employment matters. During all settlement discussions, the parties
15 conducted their negotiations at arm's length in an adversarial position. In the course of mediation
16 and settlement negotiations, the parties discussed all aspects of the Actions, including the risks and
17 delays of further litigation, the risks to the Parties of proceeding with class certification and/or trial,
18 as well as the law relating to, *inter alia*, class certification, off-the-clock theory, meal and rest
19 periods, unreimbursed business expenses, PAGA representative actions, and wage-and-hour law and
20 enforcement, as well as the evidence produced and analyzed, and the possibility of appeals, among
21 other things. Arriving at a settlement that was acceptable to all Parties was not easy. After
22 conducting extensive investigations, informal discovery, and settlement negotiations, and with the
23 aid of the mediator's evaluations, the Parties have agreed to resolve the matter given the legal issues
24 relating to Plaintiffs' principal claims, as well as the costs and risks to both sides that would attend
25 further litigation, and the real possibility of no recovery after years of litigation.

26 **CLASS REPRESENTATIVE ENHANCEMENT PAYMENTS TO PLAINTIFFS**

27 12. The Settlement Agreement provides for payments of up to Ten Thousand Dollars and
28 Zero Cents (\$10,000.00) each to Plaintiffs as Class Representative Enhancement Payments to be

1 paid out of the Gross Settlement Amount, subject to approval by the Court. The contemplated
2 enhancement payments are fair and appropriate in light of the time and effort that Plaintiffs expended
3 to pursue the matter. Plaintiffs were available whenever Class Counsel needed them and actively
4 tried to obtain information that would facilitate the litigation of this matter. Accordingly, it is
5 appropriate and just for Plaintiffs to receive a reasonable class representative enhancement payment,
6 in addition to their individual settlement payments.

7 13. I submit that the Settlement is fair, reasonable, and adequate, and it is in the best
8 interest of Plaintiffs, Class Members, PAGA Group Members, and the State of California.

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

11 Executed on this 3rd day of February 2026, at Glendale, California.

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14 Ryan Slinger
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