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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.

Case No. CV2024-0729

**DECLARATION OF VICTOR AUGUST IN
SUPPORT OF CLASS AND PAGA
ACTION SETTLEMENT**

I, VICTOR AUGUST, hereby declare under penalty of perjury as follows:

1. I have personal knowledge of all matters stated herein, and if called as a witness, I could and would competently testify thereto, except as to those matters stated upon information and belief, and as to those matters, I believe them to be true.
2. I am a named Plaintiff and Class Representative in the above-captioned lawsuit, and I submit this declaration in support of settlement approval.
3. I worked for Defendant CME Transco, LLC ("CME") as an hourly employee based in Sacramento, California, with the job title of truck driver during the Class Period.
4. Since becoming a named plaintiff, I diligently worked on this case. I always answered phone calls from my attorneys or called them back promptly when they called. I also promptly responded to emails sent by my attorneys. On many occasions, I spoke with my attorneys for case related purposes. At the beginning of the case, I searched for any documents I received from CME, such as pay stubs and other records of my time worked. I assisted my attorneys in investigating the case and helped craft discovery that was sent out to CME. I worked diligently with my attorneys to address to any questions or issues that came up to help progress the case.
5. I was aware that, at some point in this case, I could have my deposition taken. I knew that the deposition could take a full day and that I may have to meet with my attorneys prior to my deposition. I was at all times ready and willing to sit for my deposition.
6. Although I did not attend the mediation in person, I was available on the phone for all the negotiations, which I was kept apprised of and assisted in. I was also apprised of the settlement discussions that occurred after the mediation. I gave my consent to settle with CME for the gross settlement amount of \$1,500,000. I completely and carefully reviewed the memorandum of understanding and the settlement agreement.
7. In light of the work I performed in this case and the duties associated with being a class representative in a case of this magnitude, I believe the \$10,000 service payment award is reasonable. I understand that this additional service award is not guaranteed and is subject to Court approval.

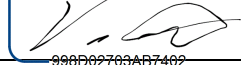
1 8. I have and will continue to adequately represent all of the interests of the class. With my
2 status as class representative, I will treat the interests of the Class above my interests.

3 9. My claims are typical of the Class Members because I am similarly situated to all other
4 current and former California-based truck drivers, driver helpers, and related job
5 classifications employed by Defendants Core-Mark International, Inc. and/or CME
6 Transco, LLC, within the State of California at any time from March 19, 2020, through
7 June 22, 2025. Thus, my interests are the same as all members of the proposed Class.

8 10. I recognize that any resolution of this matter must be approved by the Court in terms of
9 whether the settlement is fair and reasonable, and that I am obligated to protect the
10 interests of all of class members for the Class Period.

11 I declare under penalty of perjury under the laws of the State of California that all the
12 foregoing is true and correct.

13
14 Dated: 2/2/2026

DocuSigned by:

998D02703AB7402...
Victor August