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8 *Attorneys for Plaintiffs*

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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF SANTA CLARA**

12 JEFFERSON RODRIGUEZ, individually, and
13 on behalf of other members of the general
14 public similarly situated and on behalf of other
aggrieved employees pursuant to the California
Private Attorneys General Act,

15
16 Plaintiff,

17 vs.

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19 STATEWIDE TRAFFIC SAFETY AND
20 SIGNS, INC., a Delaware corporation now doing
21 business as AWP SAFETY; TRAFFIC
22 SOLUTIONS CORPORATION; and DOES 1
through 50, inclusive,

23 Defendants.
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**Electronically Filed
by Superior Court of CA,
County of Santa Clara,
on 7/10/2025 7:47 PM
Reviewed By: Y. Chavez
Case #23CV428021
Envelope: 20052693**

Case No.: 23CV428021

CLASS ACTION

*[Assigned for all purposes to the Hon.
Theodore C. Zayner, Dept. 19]*

**DECLARATION OF JEFFERSON
RODRIGUEZ IN SUPPORT OF
APPROVAL OF CLASS ACTION
SETTLEMENT**

DECLARATION OF JEFFERSON RODRIGUEZ

I, JEFFERSON RODRIGUEZ, declare as follows:

1. I am an individual over the age of 18 and am a named plaintiff in this matter against Statewide Traffic Safety and Signs, Inc. and Traffic Solutions Corporation (“Statewide”). This declaration is submitted in support of approval of the proposed class action 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 worked for Statewide as a non-exempt, hourly employee in the position of “traffic controller” from approximately 2021 until approximately July 2023.

3. While working for Statewide, I do not believe that I was paid for all of my hours worked. In addition, I believe that I was not provided all of the meal periods and rest periods that I was entitled to under California law, and that I was not reimbursed for all expenses I incurred while working for Statewide. As a result of these violations, I understand that I was also issued inaccurate wage statements and was not paid all wages owed to me at the end of my employment.

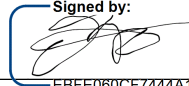
4. When I discussed this case with my attorneys and agreed to move forward with this case, I understood that this lawsuit could benefit other Statewide employees by helping to recover unpaid wages and other penalties. I knew that filing a lawsuit carries risk, but I accepted this risk because I wanted to vindicate my and other employees’ rights. Even though I understood that filing a lawsuit is a public record, I accepted that burden in order to help other Statewide employees.

5. I have been actively involved in this case since I first had discussions with my attorneys at Marquee Law Group about a potential class action back in September 2023. I have had many discussions with my attorneys throughout this case to discuss Statewide’s policies and practices, identify potentially helpful documents and witnesses, and discuss case strategy. I spent significant time searching my own documents, and I also spent time reviewing the Settlement Agreement with my attorneys. I estimate that I have spent at least 30-35 hours on this case from the time I first spoke with my attorneys regarding this case until the present.

1 6. As part of the proposed Settlement, I understand that my attorneys will request
2 that the Court approve a service award of \$10,000 for my efforts on behalf of the Settlement
3 Class. I believe this amount is reasonable based on the amount of time and effort I have
4 devoted to this case as well as the risks I have undertaken as the class representative, as
5 described above.

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

8 Dated: 7/2/2025

Signed by:


Jefferson Rodriguez

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On July 10, 2025 I served the foregoing document(s) described as:

on all interested parties in this action by transmitting a true copy of the document(s) described above, addressed as follows:

- () **BY MAIL** as follows: I am “readily familiar” with the firm’s practice of collection and processing of correspondence for mailing with the United States Postal Service. I know that the correspondence was deposited with the United States Postal Service on the same day this declaration was executed in the ordinary course of business. I know that the envelope was sealed and, with postage thereon fully prepaid, placed for collection and mailing on this date in the United States mail at Beverly Hills, California.
- () **BY PERSONAL SERVICE:** I caused to be delivered such envelope by hand to the above addressee(s).
- () **BY OVERNIGHT COURIER:** I am “readily familiar” with the firm’s practice of collecting and processing overnight deliveries, which includes depositing such packages in a receptacle used exclusively for overnight deliveries. The packages were deposited before the regular pickup time and marked accordingly for delivery the next business day.
- (X) **BY ELECTRONIC TRANSMISSION:** Participants in this case were served electronically to the address of the recipient(s) as set forth below. I am readily familiar with the Code of Civil Procedure and California Rules of Court for electronic service and this document/these documents were duly served electronically in accordance with said rules and regulations on the date stated above, and the transmission was reported as complete and without error.


Yessi Chinchilla

SERVICE LIST:

LITTLER MENDELSON, P.C. c/o Ryan L. Eddings, Esq. c/o Annureet K. Bezwada, Esq. c/o Aaron M. Bausch, Esq. 5200 North Palm Ave. Suite 302 Fresno, California 93704.2225 Telephone: 559.244.7500 Fax No.: 559.244.7525 Email: reddings@littler.com , abezwada@littler.com , abausch@littler.com , MGutierrez@littler.com ,	<i>Attorneys for Defendant STATEWIDE TRAFFIC SAFETY AND SIGNS, INC.</i>
WILSHIRE LAW FIRM c/o Benjamin H. Haber, Esq. c/o Daniel J. Kramer, Esq. 660 S. Figueroa Street, Sky Lobby Los Angeles, CA 90017 Telephone: (213) 381-9988 Facsimile: (213) 381-9989 Email: benjamin.haber@wilshirelawfirm.com ; daniel.kramer@wilshirelawfirm.com ;	<i>Co-Counsel</i>