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County of Santa Clara,
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Case #23CV428021
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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

JEFFERSON RODRIGUEZ, 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,

Plaintiff,

v.

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

Defendants.

Case No.: 23CV428021

CLASS ACTION

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

**DECLARATION OF JESSIE KNIGHT,
SR. IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: August 13, 2025
Time: 1:30 PM
Dept.: 19

Action Filed: December 22, 2023
Trial Date: Not Set

1 **DECLARATION OF PLAINTIFF JESSIE KNIGHT, SR.**

2 I, Jessie Knight, Sr., declare as follows:

3 1. I am an adult resident of the State of California, and, if called as a witness in this
4 action, I would testify truthfully to the matters described in this declaration. All of the matters
5 described in this declaration are within my personal knowledge, except those matters that are stated
6 to be upon information and belief. As to such matters, I believe them to be true.

7 2. I make this declaration entirely of my own free will and choice. I have not been
8 promised any benefit for doing so, and I have not been pressured into giving this declaration.
9 Before signing this declaration, I was given the opportunity to review it, make changes, and verify
10 the accuracy of its contents.

11 3. I am a former employee of Statewide Traffic Safety and Signs, Inc. (“Defendant”).
12 I worked for Defendant from approximately July 2022 to approximately August 2024 as an hourly-
13 paid, non-exempt employee. Throughout the entirety of my employment, I was subject to all of
14 Defendant’s policies and practices that have been alleged as unlawful in the Class Action
15 Complaint and Private Attorneys General Act (“PAGA”) Notice sent to Defendant and the Labor
16 & Workforce Development Agency (“LWDA”).

17 4. I joined this lawsuit because I was concerned that I was not paid properly for all the
18 hours that I worked, and I was not provided all of my meal and rest breaks.

19 5. I also understand that it is my duty as a class representative to represent the best
20 interests of the class, know about the lawsuit, assist my attorneys, and keep updated on the case.

21 6. I have invested a lot of personal time and energy into this lawsuit, including
22 assisting with the mediation and settlement process. I estimate that I have spent at least 45 hours
23 on this case since contacting Wilshire Law Firm. I made it a priority to be actively involved
24 because I wanted to do everything I could to assist my attorneys in prosecuting this case.

25 7. Throughout this case, I spent a lot of time on the phone with my attorneys to get
26 updates about the case and provide them with information. I also talked extensively to the attorneys
27 and staff at Wilshire Law Firm to prepare for mediation. During these calls, we discussed my
28

1 experience working for Defendant, including my issues with getting breaks, getting paid for all
2 time worked, and getting reimbursed for all the expenses I incurred.

3 8. I spent numerous hours looking for documents related to my employment with
4 Defendant. I also spent time reviewing legal documents in this case, including the retainer and
5 settlement agreement and discussed, in detail, the terms with my attorneys.

6 9. Additionally, I made myself fully available on the day of mediation and was in
7 continuous contact with my attorneys to assist with any questions or issues that may have arisen.

8 10. I believe the settlement is a good settlement and I would recommend that the Court
9 approve it because I believe that this settlement is fair, adequate, and reasonable.

10 11. I did not make the decision to join this case lightly. I was concerned by the attention
11 a publicly filed lawsuit, and especially a class action, would attract. For example, I understood
12 that my name would be associated with a lawsuit that against my former employer. I am mindful
13 that prospective employers might find out that I sued Defendant. Nevertheless, I felt that important
14 rights were at stake that hurt everyone, and something ought to be done about it.

15 12. I also understand that there was financial risk in bringing this lawsuit. For example,
16 I knew that if I did not prevail in this lawsuit that I could potentially be responsible for Defendant's
17 attorneys' fees and costs.

18 13. I understand that the settlement agreement provides a service payment to me of up
19 to \$10,000.00. I believe this amount is fair compensation for my time and effort on this case, for
20 helping to prosecute this case, and the risks with respect to my future employment. In addition,
21 the settlement requires that I enter into a general release, which I understand is broader than the
22 release that will bind other class members. During the course of this case and since I ended my
23 employment with Defendant, I have battled health issues and struggled financially to pay housing
24 costs and utilities. I have also had to borrow money from various family members in order to cover
25 these costs. I am receiving no additional compensation to that provided for in the settlement.

26 14. Based on my involvement in this case and the benefits provided to my former co-
27 workers, I am happy that I and the other plaintiffs were able to stand up for the other workers who
28 were too afraid to say anything to management because they did not want to risk losing their jobs

1 or risk the stigma of suing an employer. I was not afraid to take that risk because I strongly care
2 about helping out my former co-workers.

3 15. I reviewed and ultimately signed the Class Action and PAGA Settlement Agreement
4 in full and my attorneys answered all the questions I had. I believe the settlement terms and
5 allocations are fair, adequate, and reasonable given the strength of the class claims and Defendant's
6 defenses.

7 16. I have no conflicts of interest with any class member or the Settlement
8 Administrator, Pheonix Settlement Administrators.

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

11 Executed on Jul 10, 2025, at Fairfield, California.

12
13 

Jessie Knight Sr. (Jul 10, 2025 14:31 PDT)

14 Jessie Knight, Sr.

1 **PROOF OF SERVICE**

2 I declare that I am over the age of eighteen (18) and not a party to this action. My business
3 address is 9100 Wilshire Boulevard, Suite 445, East Tower, Beverly Hills, California 90212.

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

5 **DECLARATION OF JESSIE KNIGHT, SR. IN SUPPORT OF PLAINTIFF MOTION**
6 **FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

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

9 **SEE ATTACHED SERVICE LIST**

- 10 () **BY MAIL** as follows: I am “readily familiar” with the firm’s practice of collection and
11 processing of correspondence for mailing with the United States Postal Service. I know
12 that the correspondence was deposited with the United States Postal Service on the same
13 day this declaration was executed in the ordinary course of business. I know that the
14 envelope was sealed and, with postage thereon fully prepaid, placed for collection and
15 mailing on this date in the United States mail at Beverly Hills, California.
- 16 () **BY PERSONAL SERVICE:** I caused to be delivered such envelope by hand to the
17 above addressee(s).
- 18 () **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.

19 I declare under penalty of perjury under the laws of the State of California that the above is
20 true and correct. Executed on July 10, 2025 at Beverly Hills, California.

21
22 
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>