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behalf of others similarly situated and aggrieved

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

TERRELL HUNT, individually and on
behalf of all others similarly situated and
aggrieved,

Plaintiff,

vs.

LIQUID TRANSPORT CORP, an Indiana
Corporation; LIQUID TRANSPORT, LLC,
an Indiana Limited Liability Company;
DANA TRANSPORT, INC., a New Jersey
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 24STCV10101

[Assigned for all purposes to Hon. Elihu M. Berle,
Dept. 6]

**DECLARATION OF TERRELL HUNT IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT**

Date: June 22, 2026

Time: 9:00 a.m.

Department: 6

Action Filed: April 22, 2024

Trial Date: Not set

DECLARATION OF TERRELL HUNT

I, Terrell Hunt, declare as follows:

1. I am an individual over the age of 18. I am the named Plaintiff and proposed Class Representative in the above-referenced action. I have personal knowledge of the facts set forth below, and if called to testify I could and would do so competently.

2. This declaration is submitted in support of Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement.

3. I worked for Defendants Liquid Transport Corp; Liquid Transport, LLC; and Dana Transport, Inc. (collectively, "Defendants") as a commercial truck driver within the state of California from approximately September 2022 to February 2024.

4. I understand that the claims alleged in this action were brought on a representative basis on behalf of other class members and aggrieved employees who worked for Defendants. I do not believe I have any interests that are adverse to the other class members and aggrieved employees that are part of the class action and PAGA settlement. I was not offered anything to be the Class Representative, nor have I received anything. I agreed to be the Class Representative because I thought it was the right thing to do.

5. I have spent a significant amount of time discussing this matter with my attorneys on many occasions and explaining my understanding of Defendants' practices. To date, I have performed a number of tasks in my role as the representative, including, discussing this case and the facts involved with my attorneys, searching for and providing documents pertaining to the case to my attorneys, reviewing the files and pleadings, the PAGA letter, the complaints, and the settlement agreement, and responding to any questions from my attorneys on a regular basis. If this case had continued in litigation, I was prepared to testify in my deposition. If this case had gone to trial, I was prepared to participate in the trial, including by testifying.

6. I have reviewed the Class Action and PAGA Settlement Agreement, and I believe that the settlement is in the best interest of all class members and aggrieved employees who worked for Defendants. I believe the proposed settlement is reasonable, fair, and adequately compensates the class members and aggrieved employees for the violations alleged in the complaint.

7. I also understood that filing this lawsuit is a public record, and I accepted that burden.

As such, I risked my future employment in order to bring this action. Moreover, this lawsuit, which is a public record, is something that potential employers can look into, and which may cause a negative impact on my employment prospects.

8. Additionally, in connection with the settlement, I also executed a general release of any and all claims, known and unknown, including a waiver of Civil Code § 1542, which was not required of other individuals.

9. I am not involved in the governance or work of Public Citizen Foundation, the proposed *cy pres* recipient in this case.

10. I am proud of the result and accomplishment of this lawsuit, and I am in favor of this settlement. I feel that the settlement is a positive achievement of this lawsuit and understand that other people will benefit because of the actions that I have taken. I feel that I took upon myself the risk of this lawsuit and achieved a result for my other former co-workers who did not have to file suit.

11. I believe the \$15,000 service award I have requested is fair compensation for my efforts in support of this action, the risks I undertook, and the success of this lawsuit.

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

Executed on 4/23/2026, at Elk Grove, California.

DocuSigned by:



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Terrell Hunt