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Attorneys for Defendants
R AND T OIL INCORPORATED, RAFI
BARTANIYAN, and THOMAS VARTANIAN

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE – RIVERSIDE HISTORIC COURTHOUSE

ARLENE APODACA, on behalf of herself and
all others similarly situated, and the general
public, and as an “Aggrieved Employee” on
behalf of other “Aggrieved Employees” and the
State of California under the Private Attorneys
General Act of 2004

Plaintiff(s),

v.

R AND T OIL INCORPORATED, a California
corporation; RAFI BARTANIYAN, an
individual; THOMAS VARTANIAN, an
individual; and DOES 1-50, inclusive,

Defendant(s).

CASE NO. CVRI2402196

**DECLARATION OF THOMAS VARTANIAN
RE SETTLEMENT**

DECLARATION OF THOMAS VARTANIAN

I, THOMAS VARTANIAN, declare as follows:

1. I, Thomas Vartanian, declare that the following facts are true of my own personal knowledge and, if called upon to testify, I could and would testify as follows:
2. I am the Vice-President of Defendant R AND T OIL INCORPORATED, a California corporation (“Defendant R and T”).
3. It is my understanding that the parties hereto have reached an agreement as to the material terms of a class-wide settlement (“Settlement”) and that once approved by this Court will resolve this action in its entirety.

1 4. Currently, I am not aware of any class, representative, or other collective action in any
2 other court in this or any other jurisdiction that asserts claims similar to those asserted in this action
3 on behalf of a class or group of individuals some or all of whom would also be members of the class
4 defined in this action.

5 5. Accordingly, I am not aware of any other pending matter or action asserting claims
6 that will be extinguished or adversely affected by the Settlement.

7 6. Furthermore, based on my knowledge of Defendant R and T employees, they are over
8 the age of 18 with adequate education and experience. Therefore, with respect to their age,
9 education, and experience, I believe that Defendant R and T employees have the requisite ability to
10 read and comprehend English. Therefore, I do not believe it is necessary for any notice packet with
11 respect to the Settlement to be translated to Spanish or any other languages.

12 I declare under penalty of perjury under the laws of the State of California that the foregoing
13 is true and correct and that I executed this Declaration on September 18, 2026 in Newport Beach,
14 California.

15 By:  Thomas Vartanian (Sep 18, 2026 15:08:02 PDT)
16 Thomas Vartanian, Vice-President
17 R AND T INCORPORATED

18 By:  Thomas Vartanian (Sep 18, 2026 15:08:02 PDT)
19 Thomas Vartanian, an individual
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