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10 individually, and on behalf of all others similarly
situated

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF ORANGE**

13
14 JOHN MARGARITIS JR, individually, and on
behalf of all others similarly situated,

15
16 Plaintiff,

17 vs.

18 AAA OIL, INC. DBA CALIFORNIA FUELS
AND LUBRICANTS, a California corporation;
19 and DOES 1 through 10, inclusive,

20 Defendants.
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Case Nos.:

30-2024-01383304-CU-OE-CXC (lead);
30-2024-01416794-CU-OE-CXC

*Assigned for all purposes to: Hon. Randall J.
Sherman, Dept. CX105*

**DECLARATION OF JOHN
MARGARITIS, JR. IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

I, John Margaritis, Jr., hereby declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration in support of my Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for AAA Oil, Inc. dba California Fuels and Lubricants (“AAA”) as an hourly-paid, non-exempt Field Truck Driver from April to August 2023.

3. Based on my experience and knowledge of AAA’s wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on my own behalf as well as on behalf of other hourly-paid, non-exempt employees of AAA.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to other hourly-paid, non-exempt employees of AAA. I believe we were all subject to the same employment policies and practices.

5. I do not have any conflicts with other hourly-paid, non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid, non-exempt employees at AAA.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid, non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by AAA’s company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by AAA.

7. I have always kept the best interests of the other hourly-paid, non-exempt employees in mind while performing my duties as the named plaintiff in this case. I have been committed throughout the course of this case to vigorously prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the other hourly-paid, non-exempt employees by initiating this lawsuit, providing documents and information to my attorneys, keeping in regular contact with my attorneys regarding the status of the case, and reviewing the settlement agreement to make sure it was fair.

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

DocuSigned by:
John Margaritis
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John Margaritis, Jr. v. AAA Oil, Inc.

I, Jonathan Melendez, state that I am employed in the aforesaid County, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 3055 Wilshire Blvd., 12th Floor, Los Angeles, California 90010. My electronic service address is Jonathan.melendez@wilshirelawfirm.com.

On June 16, 2025, I served the foregoing **DECLARATION OF JOHN MARGARITIS, JR. IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** , on the interested parties by placing a true copy thereof, enclosed in a sealed envelope by following one of the methods of service as follows:

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[X] BY EMAIL OR ELECTRONIC TRANSMISSION: Pursuant to CCP § 1010.6, I caused the document(s) to be sent to the person(s) at the E-Mail address(es) listed below including OneLegal. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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

Executed on June 16, 2025, at Oakland, California.


Jonathan D. Melendez