

1 **JUSTICE FOR WORKERS, P.C.**
William C. Sung SB# 280792
2 E-Mail: william@justiceforworkers.com
Tiffany L. Luu SB# 335127
3 E-Mail: tluu@justiceforworkers.com
Joseph C. Ramli SB# 339491
4 E-Mail: jramli@justiceforworkers.com
9575 Bolsa Ave
5 Westminster, CA 92683
Tel: 323-922-2000
6 Fax: 323-922-2000

7 Attorneys for Plaintiffs EDGAR LUNA TORRES
and EFRAIN BARRIOS

8
9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF LOS ANGELES**

12 EDGAR LUNA TORRES, an individual and
13 on behalf of all others similarly situated;

14 Plaintiffs,

15 vs.

16 YUNEXPRESS USA, INC., a New Jersey
17 corporation; and DOES 1 through 50,

18 Defendants.

Case No.: 24STCV16391

[Assigned for All Purposes to:
Hon. Elihu M. Berle, Dept. 6]

**DECLARATION OF EFRAIN BARRIOS
TORRES IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEY'S FEES AND COSTS, AND
CLASS REPRESENTATIVE SERVICE
PAYMENT**

(Filed concurrently with Motion for Final
Approval, Supporting Declarations, and
[Proposed] Judgment and Order)

DATE: September 8, 2025
TIME: 9:00 a.m.
DEPT: 6

Action Filed: July 1, 2024
Trial Date: Not Set

1 I, Efrain Barrios, hereby declare as follows:

2 1. I am an individual over the age of 18 year and the named Plaintiff in the above-
3 captioned matter. This declaration is submitted in support of approval of the proposed class action
4 settlement ("Settlement") reached in this case. I have personal knowledge of the facts contained in
5 this declaration, and if called as a witness, could and would testify as to their accuracy.

6 2. I was employed by Defendant YunExpress USA, Inc. ("Defendant") as hourly-paid,
7 non-exempt forklift driver from approximately November 2022 to approximately March 4, 2024
8 when Defendant terminated my employment. During my employment with Defendant, I was subject
9 to Defendant's wage and hour policies and practices that are at issue in this case.

10 3. Specifically, I frequently worked off the clock without pay during my meal breaks at
11 my supervisors' instructions, I frequently was unable to take compliant meal and rest breaks, and I
12 had to download the WeChat app on my cellphone to communicate with and send photos of
13 merchandise to my supervisors without reimbursement. I was part of a group of employees who
14 made complaints to our supervisor and HR about these issues but nothing was done. As a result of
15 the foregoing issues, I believe I received inaccurate wage statements and was not paid all wages
16 when my employment with Defendant ended. I believe other non-exempt employees of Defendant
17 were subject to the same policies and procedures discussed above and that my claims against
18 Defendant for unpaid wages and statutory and civil penalties are typical of Class Members' claims.

19 4. I have been actively involved in this case since I first retained Justice for Workers,
20 P.C. ("JFW") in July 2024. Without waiving the attorney-client privilege, prior to filing this lawsuit,
21 my attorneys explained my role and responsibilities as a Class Representative, and I understand my
22 responsibilities as a Class Representative. Since retaining my attorneys, I have had many
23 discussions and in-person meetings with the attorneys and staff at JFW, discussions regarding
24 Defendant's wage and hour practices and my claims in this case, litigation strategy, updates on how
25 the case was proceeding, the Settlement, and how I could help the case and potential Class
26 Members. I also gathered and reviewed documents for use in the lawsuit and reviewed relevant
27 documents with my attorneys. I estimate that I have spent at least 15 hours on this case from the
28 time I first spoke with my attorneys regarding this case until the present. I also understand that as

1 part of the Settlement, I have agreed to a general release of claims against Defendant, which is
2 broader than the release of claims agreed to by other Class Members.

3 5. Furthermore, there is no conflict between my interests and the interests of the class
4 that I am seeking to represent. My interests are entirely coextensive with the interests of the Class. I
5 allege that I was injured by the same company-wide policies and practices to which the proposed
6 Class was subjected and seek the same relief. I have already demonstrated my ability to advocate
7 for the interests of the Class by initiating this litigation, undertaking extensive class discovery, and
8 evaluating the proposed settlement to assure that it is fair.

9 6. I understood that at the time I filed this action, as a Class Representative, I owed a
10 duty to the putative class members to faithfully prosecute this action with their best interests at the
11 forefront of every decision. I understood that I could not make any decision in this action for the
12 sole benefit of my personal interest. I understood that in executing this duty, I might have been
13 asked to sacrifice my personal best interests for the benefit of the interests of the putative class
14 members. Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the
15 broadest possible relief for my former co-workers for what I perceived to be Defendant's unlawful
16 wage and hour practices. I believe that I faithfully executed the duties of a Class Representative
17 throughout this litigation and will continue to do until this litigation is fully and finally resolved.

18 7. I understand that my attorneys will request that the Court approve a service award
19 of \$5,000.00 for my efforts on behalf of the Class. I believe this amount is reasonable based on the
20 amount of time and effort I have devoted to this case and the risks I have undertaken as a Class
21 Representative as described above. My support for the Settlement is not contingent on my receiving
22 this service award.

23 8. I do not have any conflict of interest with the proposed Administrator, Phoenix Class
24 Action Administrators.

25 ///

26 ///

27 ///

28 ///

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

3 Executed on October 29, 2025 at Los Angeles, California.

4
5 

6 _____
Efrain Barrios