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VARELA, RON VARELA, and JASON VARELA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

KATIE MILLER, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

CONTERA CONSTRUCTION
CORPORATION, a California
Corporation; and DOES 1 through 20,
inclusive;

Defendants.

Case No.: CVRI2403479
*[Assigned to Hon. Harold W. Hopp, Dept 1, for
all purposes]*

**DECLARATION OF BERNADETTE
VINSON IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing

Date: January 26, 2026

Time: 8:30 a.m.

Dept.: 1

I, Bernadette Vinson, the undersigned, declare as follows:

1. I am over the age of eighteen years, and I am not a party to this action. I am an employee of Defendant Contera Construction Corporation (“Contera”). I make this declaration based upon my personal firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. I make this declaration in support of Plaintiff’s unopposed motion for preliminary approval of class action and PAGA settlement.

3. I am the HR manager for Contera. I am responsible for maintaining employment files for all Contera's employees and I have a strong working knowledge of the backgrounds and qualifications of Contera's employees.

4. The class in this case is comprised of approximately 95% truck drivers who possess a commercial license to operate large trucking vehicles. The other 5% are office personnel, with a couple of mechanics responsible for truck upkeep and maintenance.

5. The age range of the class is primarily the early 20s through the mid-60s.

6. A significant majority of the class has a high school diploma or equivalent certificate as their highest level of formal education. This does not account for the commercial truck driving training 95% would have undertaken to qualify for their position as a truck driver with Contera.

7. The entire class can read and comprehend English. I believe there is a small percentage of the class that likely prefers to read and write in Spanish, but all class members have shown the ability to proficiently read and comprehend instructions, policies, manuals, etc., that are written in English and Spanish and provided during onboarding at Contera.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct. Executed on December 22, 2025, at Temecula, California.

By: Bernadette Vinson
Bernadette Vinson