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9 Attorneys for Plaintiff ADAN MENDOZA,
10 on behalf of himself, all others similarly situated,
11 and on behalf of the general public.

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **IN AND FOR THE COUNTY OF SAN BERNARDINO**

14 ADAN MENDOZA, on behalf of
15 himself, all others similarly situated, and
16 on behalf of the general public,

17 Plaintiffs,

18 v.

19 ELITE FUELS TRANSPORTATION,
20 INC.; and DOES 1-100,

21 Defendants.

Case No. CIVSB2427100

**DECLARATION OF ADAN MENDOZA IN
SUPPORT OF SETTLEMENT APPROVAL**

I, ADAN MENDOZA, hereby declare under penalty of perjury as follows:

1. I have personal knowledge of all matters stated herein, and if called as a witness, I could and would competently testify thereto, except as to those matters stated upon information and belief, and as to those matters, I believe them to be true.
2. I am a named Plaintiff and Class Representative in the above-captioned lawsuit, and I submit this declaration in support of settlement approval.
3. I worked for Defendant Elite Fuels Transportation (“Elite Fuels”) as an hourly employee based in San Bernardino, California, with the job title of truck driver during the Class Period.
4. Since becoming a named plaintiff, I diligently worked on this case. I always answered phone calls from my attorneys or called them back promptly when they called. I also promptly responded to emails sent by my attorneys. On many occasions, I spoke with my attorneys for case related purposes. At the beginning of the case, I searched for any documents I received from Elite Fuels, such as pay stubs and other records of my time worked. I assisted my attorneys in investigating the case and helped craft discovery that was sent out to Elite Fuels. I worked diligently with my attorneys to address to any questions or issues that came up to help progress the case.
5. I was aware that, at some point in this case, I could have my deposition taken. I knew that the deposition could take a full day and that I may have to meet with my attorneys prior to my deposition. I was at all times ready and willing to sit for my deposition.
6. Although I did not attend the mediation in person, I was available on the phone for all the negotiations, which I was kept apprised of and assisted in. I was also apprised of the settlement discussions that occurred after the mediation. I gave my consent to settle with Elite Fuels for the gross settlement amount of \$370,000. I completely and carefully reviewed the memorandum of understanding and the settlement agreement.
7. In light of the work I performed in this case and the duties associated with being a class representative in a case of this magnitude, I believe the \$7,500 service payment award is

1 reasonable. I understand that this additional service award is not guaranteed and is subject
2 to Court approval.

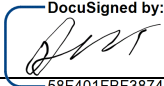
3 8. I have and will continue to adequately represent all of the interests of the class. With my
4 status as class representative, I will treat the interests of the Class above my interests.

5 9. My claims are typical of the Class Members because I am similarly situated to all other
6 hourly drivers, or similar job designations, who drove for Elite Fuels Transportation Inc.
7 and performed the majority of their work in California and/or or had their base of
8 operations in California during the Class Period. The Class Period is defined as the period
9 from August 1, 2023 through September 14, 2025. Thus, my interests are the same as all
10 members of the proposed Class.

11 10. I recognize that any resolution of this matter must be approved by the Court in terms of
12 whether the settlement is fair and reasonable, and that I am obligated to protect the
13 interests of all of class members for the Class Period.

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

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17 Dated: 12/9/2025

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21 Adan Mendoza

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