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Attorneys for Plaintiff JOSE MARTIN

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

JOSE MARTIN, an individual, on behalf of
himself and all others similarly situated and
aggrieved,

Plaintiff,

vs.

RONDEUX RELOCATION SERVICES, INC.
doing business as PENN CORPORATE
RELOCATION SERVICES, a California
Corporation; and DOES 1 TO 25,

Defendants.

Case No.: 30-2024-01436412-CU-OE-CXC

[Assigned for all purposes to the Hon.
Melissa R. McCormick, Dept. CX105]

**DECLARATION OF PLAINTIFF JOSE
MARTIN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

Date: September 3, 2026
Time: 2:00 p.m.
Dept.: CX105

1 I, Jose Martin, hereby state and declare as follows:

2 1. I have personal knowledge of the facts set forth in this declaration and could and
3 would competently testify to them under oath if called as a witness. I submit this declaration in
4 support of my Motion for Approval of PAGA Settlement.

5 2. I worked for Defendant RonDeux Relocation Services, Inc. doing business as Penn
6 Corporate Relocation Services (“Defendant”) as a mover from about January 2022 to about
7 September 2023. My job duties included driving as a group to the client’s destination, moving
8 furniture and equipment, moving objects already disassembled, staging furniture to be assembled,
9 and assembling furniture.

10 **Risks, Both Financial and Otherwise, Faced in Bringing the Suit**

11 1. When I decided to become involved in this lawsuit as a private attorney general for
12 the State of California, I understood that I was seeking civil penalties on behalf of the State, and that
13 by doing so, I would be delaying more immediate recovery available to me through the Labor
14 Commissioner’s office.

15 2. I was also made aware that being a private attorney general in an action filed on behalf
16 of others would subject me to a stigma that is sometimes associated with those who bring these kinds
17 of lawsuits. I was aware that, as a private attorney general, I might be responsible for some or all of
18 Defendant’s legal costs if the case was not successfully concluded. Even with knowledge of these
19 risks, I was willing to go forward and to act on behalf of the other employees and the State of
20 California, but I was nervous about losing and having a judgment filed against me for costs or losing
21 job opportunities in the future.

22 3. I understood that there were risks involved in representative action lawsuits. I
23 understood that the lawsuit could continue for several years and require my services and attention
24 throughout the entire length of the lawsuit. I learned that even if we won at trial, the case could be
25 further delayed by appeals.

26 **Notoriety and Personal Difficulties Encountered**

27 4. As the named plaintiff, I am the face of the litigation. Additionally, notice of the
28 settlement will be sent to approximately 35 current and former employees of Defendant. The notice

1 will inform all of these employees that I filed a representative action against Defendant. Exposing
2 myself to this kind of publicity creates a risk for my future career prospects, since current and former
3 employees of Defendant may move to different companies or may know people at other companies
4 within the many industries for which Defendant places contractors who may not want to hire
5 someone who sued his employer.

6 **Amount of Time and Effort Spent and Duration of the Litigation**

7 5. I have spent a substantial amount of time and effort on this litigation. My work on
8 this case has included, among other things, gathering and providing my payroll records, discussing
9 potential witnesses, reviewing discovery information and data, and participating in settlement
10 discussions with my attorneys. After mediation, I remained actively involved by reviewing the
11 settlement papers and regularly contacted my counsel for updates. I estimate that since I retained my
12 counsel in August 2024, I have spent approximately 25 hours on the activities described above.

13 **Personal Benefit Received as a Result of the Litigation**

14 6. As part of the settlement in this matter, I have signed a general release of all of my
15 claims against Defendant, including the underlying unpaid wage and statutory penalties I believe I
16 am owed. The other employees who are receiving a benefit from this lawsuit are not releasing any
17 individual claims. Absent the requested enhancement award, the personal benefit I will receive is the
18 same as all other employees.

19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct. Executed on 08 / 21 / 2026, at Fullerton, California.

21
22
23 

24 Jose Martin