

1 Kevin A. Lipeles (Bar No. 244275)
2 kevin@kallaw.com
3 Thomas H. Schelly (Bar No. 217285)
4 thomas@kallaw.com
5 Jasmine Badawi, Esq. (Bar No. 335433)
6 jasmine@kallaw.com
7 LIPELES LAW GROUP, APC
8 1060 Aviation Blvd, Suite 100
9 Hermosa Beach, CA 90254
10 Telephone: (310) 322-2211
11 Facsimile: (310) 322-2252

12 Attorneys for Plaintiff
13 JOHN CLARKE
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SUPERIOR COURT OF CALIFORNIA

COUNTY OF ORANGE

JOHN CLARKE, an individual, on his own
behalf and on behalf of all others similarly
situated,

Plaintiffs,

vs.

PURPOSE DRIVEN TRANSPORT INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

**CASE NO.: 30-2024-01421145-CU-OE-
CXC**

**DECLARATION OF PLAINTIFF JOHN
CLARKE IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Judge: Hon. Melissa McCormick

Date: April 16, 2026

Time: 2:00 PM

Dept.: CX 105

Complaint Filed: August 21, 2024

Reservation ID: 74796049

DECLARATION OF JOHN CLARKE

I, John Clarke, hereby declare:

1. The facts set forth herein are true of my own personal knowledge, and if called upon to testify thereto, I could and would competently do so under oath.

2. I am the named Plaintiff in this action. On or around August 21, 2024, the Class Action Complaint entitled *Clark v. Purpose Driven Transport Inc.*, was filed in the Superior Court of California, Orange County, on behalf of myself, and all others similarly situated. On October 25, 2024, Plaintiff filed his First Amended Class Action Complaint in the Orange Superior Court, adding a claim pursuant to the Private Attorney General Act of 2004, Cal. Lab. Code §§2699, *et seq.*

3. I was employed by Defendant Purpose Driven Transport Inc. ("Defendant") as a non-exempt hourly Driver from January 31, 2024 through July 11, 2024.

4. In my Driver capacity for Defendant, I was required to work in excess of 8 hours per day and 40 hours per week. However, Defendant failed to pay me all wages due and my overtime wages owed. Further, Defendant failed to provide me with sick leave wages. Defendant also failed to pay me minimum wages due to their failure to afford compliant meal/rest breaks. Additionally, Defendant did not reimburse my business expenses.

5. I understand that, as a Class Representative, I have a duty to look out for and protect the interests of the Class as a whole. I do not believe, nor do I have any reason to believe, that my interests in this lawsuit are in conflict or in any way antagonistic to the interests of those of my fellow Class Members.

6. As the named Plaintiff in this action, I provided significant assistance to Plaintiff's Counsel in this case. I spent approximately 30 hours relating to this case. Among other things, I participated in several lengthy interviews and phone conferences over a period lasting several months, searched for and produced a significant number of relevant documents, reviewed pleadings in the case, reviewed documents and data provided by Defendant, kept in contact with my attorneys regarding the status of the case, and remotely attended the all-day mediation on December 9, 2025.

My efforts were instrumental in securing the favorable terms of the Settlement Agreement, which will provide monetary compensation to a Class of approximately 76 Class Members.

7. In addition, this case also involved risks for me, such as the risk of having to pay Defendant's costs if we lost. Disregarding these risks, I pursued this case on behalf of the Class to a successful resolution and settlement.

8. It is my understanding that based upon my industrious efforts as the named plaintiff in this action there is something called a Class Representative Service Payment. I respectfully request that the Court grant this award to me in the amount of \$10,000 in addition to my pro rata share of the settlement fund.

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

Executed on March 6, 2026 in Buena Park, California.

John Clarke

John Clarke (Mar 5, 2026 18:23:11 PST)

John Clarke