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Attorneys for defendant PURPOSE DRIVEN
TRANSPORT INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF ORANGE

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

Plaintiff,
v.

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

Defendants.

Case No. 30-2024-01421145-CU-OE-CXC

**DECLARATION OF ERIC M. LLOYD
IN SUPPORT OF PLAINTIFF JOHN
CLARKE'S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Action Filed: August 21, 2024
FAC Filed: October 25, 2024
Trial Date: Not Yet Set

1 I, Eric M. Lloyd, hereby declare as follows:

2 1. I am an attorney at law duly licensed to practice before all courts in this jurisdiction.
3 I am a partner at Medina McKelvey LLP and counsel of record for defendant PURPOSE DRIVEN
4 TRANSPORT INC. (“Defendant”) in this action. The facts set forth below are of my own personal
5 knowledge, and if called as a witness in this action, I could and would testify competently to them.

6 2. I make this declaration in support of the Motion for Preliminary Approval of Class
7 Action Settlement filed by plaintiff JOHN CLARKE (“Plaintiff”).

8 3. To the best of my knowledge, I am not aware of any class, representative, or other
9 collective action in this jurisdiction, or any other court or jurisdiction, that asserts claims similar to
10 those asserted in this action on behalf of a class or group of individuals who would also be members
11 of the class as defined in this matter. Defendant has not been provided notice of or been served in
12 any similar or related action. Additionally, a search of CasePortal by Courthouse News Service on
13 August 17, 2026, for filed cases in California also does not reveal any similar action or related case
14 against Defendant.

15 4. As such, I am unable to name any case, the nature of any claims asserted in said
16 case, or the definition of a class of parties on whose behalf any action was brought that would
17 overlap with the class as defined in this action or in the settlement agreement.

18 5. I directed my firm’s data team to calculate the number of workweeks worked by
19 individuals eligible to participate in the settlement of this action between August 21, 2020 through
20 December 31, 2025. Based on our calculations, the total number of workweeks during this time
21 period exceeds 7,400. I further directed my firm’s data team to determine the last date during this
22 same time period on which the number of workweeks did not exceed 7,400. Based on our
23 calculations, the total number of workweeks as of October 15, 2025 is 7,385. October 15, 2025 is
24 the last day before the workweek count increased by an amount sufficient to trigger the escalator
25 clause in Paragraph 8 of the Parties’ Settlement Agreement as originally drafted, and the Parties
26 accordingly agreed to shorten the Class Period and the PAGA Period in lieu of requiring Defendant
27 to increase the Gross Settlement Amount.
28

1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct to the best of my knowledge.

3
4 Executed this 18th day of August, at Walnut Creek, California.

5 

6 _____
Eric M. Lloyd