

1 **JUSTICE FOR WORKERS, P.C.**

William C. Sung SB# 280792

2 E-Mail: william@justiceforworkers.com

Tiffany L. Luu SB# 335127

3 E-Mail: tluu@justiceforworkers.com

Joseph C. Ramli SB# 339491

4 E-Mail: jramli@justiceforworkers.com

3600 Wilshire Boulevard, Suite 1815

5 Los Angeles, CA 90010

Tel: 323-922-2000

6 Fax: 323-922-2000

7 Attorneys for Plaintiff GABRIEL VELASQUEZ NUNEZ

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF RIVERSIDE**

11 GABRIEL VELASQUEZ NUNEZ, an
12 individual and on behalf of all others similarly
13 situated;

14 Plaintiff,

15 vs.

16 CPC SPECIAL LOGISTICS WEST, LLC, a
Missouri limited liability company; and DOES
17 1 through 50,

18 Defendants.

Case No.: CVRI2405862

[Assigned for All Purposes to:
Hon. Harold W. Hopp, Dept. 1]

**DECLARATION OF GABRIEL
VELASQUEZ NUNEZ IN SUPPORT OF
MOTION FOR APPROVAL OF PAGA
SETTLEMENT**

(Filed concurrently with Motion for Approval
of PAGA Settlement; Supporting
Declarations; and [Proposed] Order)

DATE: INSERT, 2026

TIME: 8:30 a.m.

DEPT: 1

RESERVATION NO: INSERT

Action Filed: October 17, 2024

Trial Date: Not Set

1 I, Gabriel Velasquez Nunez, hereby declare as follows:

2 1. I am an individual over the age of 18 year and the named Plaintiff in the above-
3 captioned matter. This declaration is submitted in support of approval of the proposed class action
4 settlement ("Settlement") reached in this case. I have personal knowledge of the facts contained in
5 this declaration, and if called as a witness, could and would testify as to their accuracy.

6 2. I worked for Defendant CPC Special Logistics West, LLC ("Defendant") as an
7 hourly-paid, non-exempt employee from approximately 2022 to approximately May 2024 as a
8 driver in Moreno Valley, California.

9 3. During my employment with Defendant, I was subjected to Defendant's policies,
10 procedures, and practices at issue in this case. Due to Defendant's policies and practices, I worked
11 off the clock performing pre-trip inspections and post-trip reporting without pay, I had to use my
12 personal cellphone to perform my driver duties without reimbursement, and Defendant failed to
13 maintain all of my payroll records. As a result of these issues, I believe I was not paid all wages
14 upon termination of employment and I did not receive accurate wage statements.
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16 4. I have been actively involved in this case since I first retained Justice for Workers,
17 P.C. ("JFW") in July 2024. Without waiving the attorney-client privilege, prior to filing this lawsuit,
18 my attorneys explained my role and responsibilities as a PAGA representative, and I understand my
19 responsibilities as a PAGA representative. Since retaining my attorneys, I have had many
20 discussions with the attorneys and staff at JFW, including three in-person meetings at my attorney's
21 office, discussions regarding Defendant's wage and hour practices and my claims in this case,
22 potential witnesses, litigation strategy, updates on how the case was proceeding, the Settlement, and
23 how I could help the case and other employees of Defendant. I also gathered and reviewed
24 documents for use in the lawsuit and reviewed relevant documents with my attorneys. I estimate
25 that I have spent at least 20 hours on this case from the time I first spoke with my attorneys
26 regarding this case until the present. I also understand that as part of the Settlement, I have agreed to
27 a general release of claims against Defendant, which is broader than the release of claims agreed to
28 by other aggrieved employees.

1 5. Furthermore, there is no conflict between my interests and the interests of the
2 aggrieved employees that I am seeking to represent. My interests are entirely coextensive with the
3 interests of the aggrieved employees. I allege that I was injured by the same company-wide policies
4 and practices to which the aggrieved employees was subjected and seek the same relief. I have
5 already demonstrated my ability to advocate for the interests of the aggrieved employees by
6 initiating this litigation, undertaking extensive class discovery, and evaluating the proposed
7 settlement to assure that it is fair.

8 6. I understood that at the time I filed this action, as a PAGA representative, I owed a
9 duty to the aggrieved employees to faithfully prosecute this action with their best interests at the
10 forefront of every decision. I understood that I could not make any decision in this action for the
11 sole benefit of my personal interest. I understood that in executing this duty, I might have been
12 asked to sacrifice my personal best interests for the benefit of the interests of the putative class
13 members. Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the
14 broadest possible relief for my former co-workers for what I perceived to be Defendant's unlawful
15 wage and hour practices. I believe that I faithfully executed the duties of a PAGA representative
16 throughout this litigation and will continue to do until this litigation is fully and finally resolved.

17 7. I understand that my attorneys will request that the Court approve a service award of
18 \$10,000.00 for my efforts on behalf of the State and other aggrieved employees. I believe this
19 amount is reasonable based on the amount of time and effort I have devoted to this case, the risks I
20 have undertaken as the PAGA representative, and my general release of claims, as described above.
21 My support for the Settlement is not contingent on my receiving this service award

22 8. Other than this action, I have not served as a plaintiff in any other class and PAGA
23 representative action. Other than this settlement, I do not have any other settlement of my individual
24 claims with Defendant.

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1 I declare, under penalty of perjury under the laws of the State of California, that the
2 foregoing is true and correct.

3 Executed on May 18, 2026 at Hemet, California.
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5 *Gabriel Velasquez Nunez*

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Gabriel Velasquez Nunez
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