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7 CPC SPECIAL LOGISTICS WEST, LLC

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF RIVERSIDE**

10
11 GABRIEL VELASQUEZ NUNEZ, an
individual and on behalf of all others similarly
12 situated;

13 Plaintiff,

14 vs.

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

17 Defendants.

Case No. CVRI2405862

Place: Dept. 1
Judge: Hon. Harold W. Hopp
[Assigned for all purposes]

**DECLARATION OF HUNTER LEGEAR
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF
SETTLEMENT**

[Assigned for all purposes to
The Honorable Harold W. Hopp, Dept. 1]

Action Filed: October 17, 2024
Trial Date: None

DECLARATION OF HUNTER LEGEAR

I, Hunter LeGear, declare and state as follows:

1. I am the General Counsel of CPC Logistics Inc., a parent company of CPC SPECIAL LOGISTICS WEST, LLC. I have held this position since 2013. All of the information set forth in this declaration is based on my personal knowledge, as well as information obtained from various business records of the Company, which I have reviewed in the course of my duties as General Counsel of CPC Logistics Inc. If called upon to testify as to the facts set forth in this declaration, I could and would do so competently and truthfully.

2. CPC SPECIAL LOGISTICS WEST, LLC is a wholly owned subsidiary of CPC SERVICES, INC., which is also its sole member-manager. CPC SERVICES, INC. is a wholly owned subsidiary of CPC LOGISTICS INC.

3. CPC SPECIAL LOGISTICS WEST, LLC seeks to include CPC SERVICES, INC., and CPC LOGISTICS INC., as released parties in the settlement of this action because, given that they are under common ownership and control with CPC SPECIAL LOGISTICS WEST, LLC, they could potentially be held jointly and severally liable for the liabilities of CPC SPECIAL LOGISTICS WEST, LLC, and/or be held to be joint employers with CPC SPECIAL LOGISTICS WEST, LLC. In order to ensure that CPC SPECIAL LOGISTICS WEST, LLC obtains the full benefit of the settlement and all liabilities alleged in this action are extinguished, and to prevent plaintiff, the State of California, and/or any other party or person for seeking recovery for those same liabilities from a related entity, CPC SPECIAL LOGISTICS WEST, LLC seeks to include these two separate but related entities as released parties in the settlement of this action.

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1 I declare under penalty of perjury under the laws of the United States of America and
2 California that the foregoing is true and correct, and that this declaration was executed on this June
3 17, 2026, at Chesterfield, Missouri.

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7 Hunter LeGear