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Attorneys for Plaintiff NOE H. LOPEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

NOE H. LOPEZ, individually, and on behalf of
all others similarly situated,

Plaintiff,

vs.

SCHNEIDER NATIONAL CARRIERS, INC.;
and DOES 1 through 10, inclusive,

Defendants.

Case No.: 24NNCV05081

[Assigned for all purposes to the Hon. William A.
Crowfoot, Dept. 3]

**DECLARATION OF NOE H. LOPEZ IN
SUPPORT OF MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

Date: March 10, 2026
Time: 8:30 a.m.
Courtroom: Dept. 3.
Judge: Hon. William A. Crowfoot

Reservation ID: **717285689735**

Action Filed: October 14, 2024
Trial Date: Not Set

DECLARATION OF NOE H. LOPEZ

I, NOE H. LOPEZ, declare as follows:

1. I am a named Plaintiff in this case. I am a former employee of the named defendant, SCHNEIDER NATIONAL CARRIERS, INC. ("Defendant"). As such, I have personal knowledge of, or am informed and believe, the following facts herein stated. I could and would competently testify if called as a witness.

2. I worked for Defendant in California as a truck driver during the statutory period. I was hired in and around 2019, and my employment ended in and around October 2023. I held the job position of truck driver that is at issue in this case.

3. I was an hourly paid employee of Defendant and was subject to the same pay structure and rules as almost all of the other hourly non-exempt employees of Defendant, given that, to my knowledge, almost all of the other hourly paid employees of Defendant are also truck drivers.

4. I have conferred with my attorneys about the settlement proposed in this case. I am not an accountant, but I understand the factors and risks that need to be considered when evaluating a settlement.

5. I have assumed some long-lasting risk in prosecuting this case. Because it is so easy to search for information online these days, I will face an increased risk that future employers will discover information about this lawsuit online and have a negative reaction to learning that I sued an employer. This may make it harder for me to obtain future employment or change jobs for a better opportunity.

6. I have devoted a substantial amount of my time, both before this lawsuit was filed and also during its litigation to ensure a fair result. This involved ongoing communications and participation with my counsel during the course of this case.

7. My participation began with bringing certain issues that are involved in this matter to my counsel's attention, and explaining the factual background that was used to prosecute the claims in this case.

8. For example, I reviewed documents which I already had, I provided relevant documents to my counsel, and I explained those documents and related facts to my counsel to assist them in their review. I also assisted in identifying potential witnesses, including other employees, who might likewise

have been of assistance.

9. My efforts continued after suit was filed. For example, I continued to identify employees and other witnesses to counsel, along with other information as to how they could be of potential use in this matter. I also discussed strategy with my counsel.

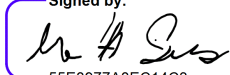
10. I also made myself available to answer any questions that arose immediately before and during the full day mediation.

11. After the mediation, a long-form settlement agreement was negotiated, and I reviewed it with my attorneys as well as I was able to ensure that its terms are likewise fair and adequate. I understand that Defendant disputes the allegations that I have made. I understand that this settlement is a compromise of disputed claims and does not constitute an admission by Defendant that any of my allegations are true. I further understand that, if the Court approves the terms of this settlement, that does not mean that the Court is ruling that my allegations are correct or that Defendant has done anything wrong.

12. I believe an enhancement of \$7,500.00 is fair and reasonable for my substantial initiative, significant efforts, results obtained, general release, and personal risks in supporting this case.

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

Executed on 1/19/2026, in California.

Signed by:

55E8977A8EC14C3

NOE H. LOPEZ, "Declarant"