

Brian J. Mankin, Esq. [CSB No. 216228]
brian@lmlfirm.com
Peter J. Carlson, Esq. [CSB No. 295611]
peter@lmlfirm.com
LAUBY, MANKIN & LAUBY LLP
5198 Arlington Avenue, PMB 513
Riverside, CA 92504
Tel: (951) 320-1444 | Fax: (951) 320-1445

Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

STEVEN PORTER, ANDRE STOKES,
TODD GASSER, CURTIS BALDWIN,
ROBB LEWIS, ANTONIO REYES, and
BERNARDO ROMERO, individually, on
a representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

JOHN CHRISTNER TRUCKING, LLC,
an Oklahoma Limited Liability Company;
HIRSCHBACH, INC., an Indiana
Corporation; HIRSCHBACH MOTOR
LINES, INC., an Iowa Corporation; and
DOES 1 through 20, inclusive;

Defendants.

Case No.: CVRI2406864
*[Assigned to Hon. Harold Hopp, Dept 1, for all
purposes]*

**DECLARATION OF PLAINTIFF ANDRE
STOKES IN SUPPORT OF MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

1 I, Andre Stokes, state and declare:

2 1. I am one of the Plaintiffs in the above captioned action. I have personal
3 knowledge of all matters stated herein and could competently testify thereto. I make this
4 declaration in support of the motion for final approval of the class action settlement. I believe the
5 settlement is fair and reasonable and is a fair resolution of the claims alleged.

6 2. When I was employed as a driver for Defendants, there were several issues with
7 how I was treated and paid. Because of these issues, I started researching California law and
8 contacted attorneys regarding how I was treated. I then contacted my attorneys and understood
9 that I had two options: (1) I could bring a class action to help all of the employees, but I would
10 have to put their interests ahead of my own, or (2) I could bring my individual case and claims
11 and attempt to maximize my individual recovery. This decision was very difficult because I
12 wanted to maximize my individual recovery, but I also wanted to help everyone else that was
13 wronged by the company. And, if I brought a class action, I was worried that I might get labeled
14 as a whistleblower, which might make it hard to find a job in the future. In the end, I decided
15 that – despite the risks – it was important to bring these claims as a class action to hold the
16 company accountable for how they treated their truck drivers.

17 3. I respectfully request that the Court approve the agreed-upon service award for
18 the following reasons.

19 4. *First*, I have spent substantial time working on this case – at least 60 hours
20 engaged in activities to benefit the class over the years since we filed the class action. I have
21 been an active participant in this litigation and have assisted my attorneys in numerous ways,
22 including helping to explain and discuss the company’s practices and their general practices and
23 procedures, locating and analyzing company documents, and communicating with other class
24 members. These efforts occurred through numerous telephone conferences, letters, emails, and
25 text communications. I also assisted in preparation for mediation and helped obtain a positive
26 result for the class. My work also continued after mediation, as I reviewed settlement agreements
27 and other settlement documents, and continued communication with Class Counsel and other
28 class members during the settlement approval processes.

5. *Second*, in agreeing to bring this class action to benefit other drivers, I agreed to set aside my personal interests and to put the interests of the class ahead of my own. In doing so, and by successfully bringing this case as a class action, I helped to obtain a highly beneficial settlement for the class members.

6. *Third*, as part of agreeing to put the interests of the Class first, I also had to agree – as part of the settlement – to waive all of my claims against the company, which other drivers were not required to do.

7. *Fourth*, by bringing this class action, I undertook significant risks and stresses at a high emotional cost without any guarantee of success. For example, filing this lawsuit and being a whistle blower was stressful on a day-to-day basis as I have constantly worried about the risk that this case could impact my ability to find future jobs. And this stress/risk lasted for the entire case, and I'm still worried it may make it hard to find a job in the future.

8. *Fifth*, bringing this case also came with a major financial risk because, if I lost the case, I would be required to pay the company's costs, which could be over \$10,000, and there was a chance they could try to make me pay their attorneys' fees as well.

9. Therefore, I respectfully request that the Court award the full requested service award since that amount is justified based on the facts above. As requested by the Court, I hereby state that I expect to receive an Individual Class Payment of \$167.74 and an Individual PAGA Payment of \$21.62.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on **Jun 29, 2026**, at San Bernardino, California.

By: Andre Stokes
Andre Stokes (Jun 29, 2026 15:45:44 PDT)

Andre Stokes