

1 Christopher C. McNatt, Jr. (SBN 174559)
2 cmcnatt@scopelitis.com
3 SCOPELITIS, GARVIN, LIGHT, HANSON & FEARY, LLP
4 2 North Lake Avenue, Suite 560
Pasadena, California 91101
Tel.: (626) 795-4700
Fax: (626) 795-4790

5 Jared S. Kramer (Pro Hac Vice)
6 jskramer@scopelitis.com
7 SCOPELITIS, GARVIN, LIGHT, HANSON & FEARY, P.C.
8 30 W. Monroe Avenue, Suite 1600
Chicago, Illinois 60603
Tel.: (312) 255-7200
Fax: (312) 422-1224

9 Attorneys for Defendants,
10 JOHN CHRISTNER TRUCKING, LLC,
11 HIRSCHBACH, INC., and
HIRSCHBACH MOTOR LINES, INC.

12
13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 COUNTY OF RIVERSIDE

15 STEVEN PORTER, individually, on a) Case No. CVRI2406864
16 representative basis, and on behalf of all)
17 others similarly situated;)

18 Plaintiff,

19 v.

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

26 Defendants.)

**DECLARATION OF MIKE DRAPEAU
IN SUPPORT OF DEFENDANTS'
COMPLIANCE WITH RIVERSIDE
SUPERIOR COURT CMO ¶ G(3)(k)(ii)**

27 I, Mike Drapeau, declare as follows:

28 1. I am employed by Hirschbach Motor Lines, Inc. ("HML") as the Director of
Compliance. Through my position and employment at HML, I am familiar with the
commercial motor vehicle ("CMV") driver qualification requirements for HML and John
Christner Trucking, LLC ("JCT"), a motor carrier that HML acquired in April 2022.

1 2. JCT is registered with the Federal Motor Carrier Safety Administration
2 ("FMCSA") as an interstate motor carrier and property broker, operating under
3 USDOT No. 273897. HML is registered with the FMCSA as a motor carrier, operating
4 under USDOT No. 65769.

5 3. All CMV drivers operating under the motor carrier authority of HML or
6 JCT must hold a commercial driver's license ("CDL"). Obtaining a CDL requires
7 passing both a written knowledge examination and a skills test, each administered in
8 English. In addition, federal regulations require that interstate CMV drivers be at
9 least 21 years old and able to "read and speak the English language sufficiently to
10 converse with the general public, to understand highway traffic signs and signals in
11 the English language, to respond to official inquiries, and to make entries on reports
12 and records." 49 C.F.R. § 391.11(b)(2). HML and JCT verify compliance with these
13 requirement as part of their driver qualification process.

14 4. I have been informed that the Class Members in this case are California-
15 resident interstate CMV drivers who either (i) contracted with HML or JCT at any
16 time from September 3, 2020, through the earlier of the Preliminary Approval Date or
17 June 3, 2026; or (ii) were employed by HML or JCT at any time from March 11, 2020,
18 through the earlier of the Preliminary Approval Date or June 3, 2026. I have also been
19 informed that these Class Members will receive a "Notice Packet" containing
20 information about the settlement.

21 5. Given that all JCT or HML interstate CMV drivers are required to hold a
22 CDL (obtained through examinations administered in English), satisfy the English-
23 language proficiency requirements of 49 C.F.R. § 391.11(b)(2), and be at least 21 years
24 old, I believe the Class Members are all over the age of 18 and possess the literacy and
25 English-language proficiency necessary to read, understand, and respond to the Notice
26 Packet. Notwithstanding, and out of an abundance of caution, I understand the Parties
27 have agreed to also provide the Notice Packet in Spanish to help ensure that all Class
28 Members can fully comprehend its contents.

1 I declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct.

3 Executed on February 17, 2026, at 2:55 pm

4 

5 Mike Drapeau
6 Hirschbach Motor Lines, Inc.

7 4906-2806-2864, v. 6

