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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 CURTIS
BALDWIN IN SUPPORT OF MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

1 I, Curtis Baldwin, 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 a driver for Defendants, there were several issues with how I was
7 treated and paid. For that reason, I started researching my rights under California law and
8 contacted my eventual attorneys (Lauby, Mankin & Lauby). I then learned that there was
9 already a pending class action case that covered the issues I had at the company – and I was
10 given the option of adding myself to the class action to pursue the claims and try to help all of
11 the employees. But I understood that, if I was added to the class action, I would be required to
12 put the interests of the class ahead of my own and would not be able to attempt to maximize my
13 individual recovery (since I would be required to consider the interests of all class members
14 above my own personal interests). I was also concerned that, if I was added to the class action, it
15 might impact my ability to find future jobs because my name would be attached to this case as a
16 whistleblower, and future employers might hold that against me. Despite these risks, I chose to
17 be added to the class action to help all employees.

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

20 4. *First*, in agreeing to be added to the class action, I agreed to set aside my personal
21 interests and to put the interests of the class ahead of my own, including foregoing a possible
22 individual settlement. In doing so, and by successfully bringing this case as a class action, I
23 helped to obtain a highly beneficial settlement for the class members.

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

27 6. *Third*, I have spent substantial time working on this case – at least 35 hours
28 engaged in activities to benefit the class. I have been an active participant in this litigation and

1 have assisted my attorneys in numerous ways, including helping to explain and discuss the
2 company's practices and their general practices and procedures, locating and analyzing company
3 documents, and communicating with other class members. These efforts occurred through
4 numerous telephone conferences, letters, emails, and text communications. I also assisted in
5 preparation for mediation and helped obtain a positive result for the class. My work also
6 continued after mediation, as I reviewed settlement agreements and other settlement documents,
7 and continued communication with Class Counsel and other class members during the settlement
8 approval processes.

9 7. *Fourth*, agreeing to join the class action came with a major financial risk because,
10 if we lost the case, I could be required to pay the company's costs, which could be over \$10,000,
11 and there was a chance they could try to make me pay their attorneys' fees as well.

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

17 9. Therefore, I respectfully request that the Court award the full requested service
18 award since that amount is justified based on the facts above. As requested by the Court, I hereby
19 state that I expect to receive an Individual Class Payment of \$3,849.66 and an Individual PAGA
20 Payment of \$145.95.

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

23 By: 
24 Curtis Baldwin (Jun 29, 2026 16:14:09 PDT)
25 Curtis Baldwin
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