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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SAN BERNARDINO**

ARTURO ORTIZ, individually, and on behalf of
 other members of the general public similarly
 situated, JORGE VALERO, individually, and on
 behalf of other members of the general public
 similarly situated, ANGEL SANCHEZ,
 individually, and on behalf of other members of
 the general public similarly situated,

Plaintiffs,

v.

HOLLYWOOD DELIVERY SERVICE, INC., a
 California corporation, and DOES 1 through 10,
 inclusive,

Defendants.

Case No.: CIVSB2432874

Assigned to Hon. Stephanie Tanada, Dept.
 S33

Complaint Filed: October 30, 2024

Trial Date: None Set

**CLASS AND REPRESENTATIVE
 ACTION**

**DECLARATION OF PLAINTIFF
 ARTURO ORTIZ IN SUPPORT OF
 PLAINTIFFS' MOTION FOR
 PRELIMINARY APPROVAL OF CLASS
 ACTION AND PAGA SETTLEMENT**

DECLARATION OF PLAINTIFF ARTURO ORTIZ

I, Arturo Ortiz, declare as follows:

1. I am an adult resident of the State of California, and, if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am a former employee of Hollywood Delivery Service, Inc. (“Defendant”). I worked for Defendant from approximately January 2013 through approximately August 2024 as a non-exempt hourly employee at Defendant’s warehouse and delivery facility in Bloomington, California. Throughout the entirety of my employment, I was subject to all of Defendant’s policies and practices that have been alleged as unlawful in the Class Action Complaint and Private Attorneys General Act (“PAGA”) Notice sent to Defendant and the Labor & Workforce Development Agency (“LWDA”).

4. I initiated this lawsuit because I was concerned that I was not paid properly for all the hours that I worked, and I was not provided with all of my meal and rest breaks. During my employment, I observed that employees often worked through meal and rest breaks or were not paid for all hours worked.

5. By originating this lawsuit as a class representative, I hoped that I might be able to change Defendant’s policies to better protect the working conditions of my co-workers. I also understood that it was my duty as a class representative to represent the best interests of the class, know about the lawsuit, assist my attorneys, and keep updated on the case.

6. I have invested a lot of personal time and energy into this lawsuit. As detailed more fully below, I have spent approximately 30 hours on this case. I made it a priority to be actively involved because I wanted to do everything I could to assist my attorneys in prosecuting this case.

7. Throughout this case, I spent a lot of time on the phone with my attorneys to get updates about the case and provide them with information. For example, during some of the phone calls, my attorneys and I were able to identify instances when I was not paid correctly. Additionally, leading up to the mediation on December 30, 2025, I had multiple lengthy phone calls with Wilshire Law Firm, PLC regarding the claims at issue and what was to transpire at the mediation.

8. Throughout the case, I also spent time looking for documents relevant to the case to send to my attorneys. I spent numerous hours looking for these documents, including when I first contacted my attorneys, before my attorneys filed the case, and before my case was mediated. I also spent time reviewing legal documents in this case, including the retainer and settlement agreement and discussed, in detail, the terms with my attorneys.

9. Additionally, I made myself available during the mediation process and communicated with my attorneys regarding the status of settlement negotiations.

10. I believe the settlement is a good settlement and I would recommend that the Court approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad that I had the opportunity to represent the class in this lawsuit and that I was able to recover money through a settlement for the class.

11. I did not make the decision to file a class action lightly. I was concerned by the attention a publicly filed lawsuit, and especially a class action, would attract. My name would be associated with a lawsuit that I filed against my former employer. I am mindful that prospective employers might find out that I sued Defendant. Nevertheless, I felt that important rights were at stake that hurt everyone, and something ought to be done about it.

12. I also understand that there was financial risk in bringing this lawsuit. For example, I knew that if I did not prevail in this lawsuit that I could potentially be responsible for Defendant's attorneys' fees and costs.

13. I understand that the settlement agreement provides a service payment to me of up to \$5,000.00. I believe this amount is fair compensation for my time and effort on this case, for helping to prosecute this case, and the risks with respect to my future employment. In addition, the

1 settlement requires that I enter into a general release, which I understand is broader than the release
2 that will bind other class members. I am receiving no additional compensation to that provided for
3 in the settlement.

4 14. Based on my involvement in this case and the benefits provided to my former co-
5 workers, I believe I helped stand up for other workers who may have been afraid to raise these
6 issues themselves because they did not want to risk losing their jobs or risk the stigma of suing an
7 employer. I was not afraid to take that risk because I strongly care about helping out my former
8 co-workers.

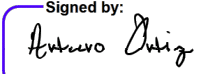
9 15. I reviewed (and ultimately signed) the Class Action and PAGA Settlement
10 Agreement in full and my attorneys answered all the questions I had. I believe the settlement terms
11 and allocations are fair, adequate, and reasonable given the strength of the class claims and
12 Defendant's defenses.

13 16. I have no conflicts of interest with any class member or the Settlement
14 Administrator, Apex Class Action Administration.

15 17. I am not aware of any other pending matter or action asserting claims that will be
16 extinguished or adversely affected by the Settlement.

17 I declare under penalty of perjury under the laws of the State of California and the United
18 States that the foregoing is true and correct.

19 Executed on 3/13/2026, at Colton, California.

20
21 Signed by: 
22 _____
23 Arturo Ortiz
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