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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

RICARDO BETANCOURTH and ALBERTO
NAVAS, as individuals and on behalf of all
others similarly situated and as aggrieved
employees and Private Attorney General,

Plaintiffs,

vs.

ECOLOGY AUTO PARTS, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 24STCV27258

*[Case assigned for all purposes to the Hon.
Laura A. Seigle, Dept. SSC-17]*

**DECLARATION OF PLAINTIFF
RICARDO BETANCOURTH IN
SUPPORT OF APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: May 22, 2026
Time: 9:00 a.m.
Dept.: SSC-17

Complaint Filed: October 17, 2024
Trial Date: None Set

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I, Ricardo Betancourth, declare as follows:

1. I am an individual over the age of 18 and am a named plaintiff in this matter. This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I have worked for Ecology Auto Parts, Inc. (“Ecology”) from approximately October 2014 to the present as a non-exempt “truck driver.” During my employment with Ecology, I was subject to Ecology’s wage and hour policies and practices that are at issue in this case.

3. During my employment with Ecology, I was paid both on a piece-rate basis where Ecology paid me a pre-determined amount per load delivered, and at certain points on an hourly basis for doing other things. Ecology required me record my hours worked by rounding them to quarter-hour increments on Ecology's drivers logs. I also believe that Ecology's piece rate compensation policy did not compensate me for all the time I spent on non-productive tasks like cleaning, maintaining, and inspecting my vehicles, and performing administrative tasks. As a result, I believe that I was not paid all the wages I was owed. While working for Ecology, my lunch breaks often started after my fifth hour of work, were cut short, or I was not able to take them at all because the work I was doing for Ecology was time sensitive and I had to do it instead of taking my full meal periods. I also did not receive second meal breaks when I worked shifts longer than 10 hours. Ecology's work demands also kept me from being able to take my full 10-minute rest breaks on time or at all. Ecology also required me to use my personal cellular phone to communicate with my supervisors and co-workers about work-related things and did not reimburse me for that expense.

4. As a result of these violations, it is my understanding that I was provided with inaccurate wage statements. Ecology also gave me "Payroll Detail For Week" documents that included information about my piece rate earnings, which were separate documents from the traditional wage statement with a detachable check. I did not believe the "Payroll Detail For Week" documents were part of my wage statements.

5. I have been actively involved in this case since I first retained Haines Law Group,

1 APC (“HLG”) in 2024. Without waiving the attorney-client privilege, prior to filing this lawsuit,
2 my attorneys explained my role and responsibilities as a Class Representative, and I understand
3 my responsibilities as a Class Representative. Since retaining my attorneys, I have had many
4 discussions with the attorneys and staff at HLG, including discussions regarding Ecology’s wage
5 and hour practices and my claims in this case, potential witnesses, litigation strategy, updates on
6 how the case was proceeding, the Settlement, and how I could help the case and potential
7 Settlement Class members. I also gathered and reviewed documents for use in the lawsuit and
8 reviewed relevant documents with my attorneys. I estimate that I have spent at least 35-40 hours
9 on this case from the time I first spoke with my attorneys regarding this case until the present.

10 6. When this lawsuit was filed, I understood that this lawsuit could benefit former and
11 current Ecology employees by helping to recover their unpaid wages, unpaid meal and rest period
12 premiums, and other penalties. I knew there was a risk that I could be liable for Ecology’s costs if
13 we lost the case. I accepted this risk because I wanted Ecology to pay its current and former
14 employees for their unpaid wages and penalties. Even though I understood that filing a lawsuit is
15 a public record, I accepted that burden in order to help former, current, and future Ecology
16 employees. As far as I am aware, I have no actual or potential conflicts with any of the Settlement
17 Class members.

18 7. I understand that my attorneys will request that the Court approve an enhancement
19 payment of \$10,000.00 for my efforts on behalf of the Settlement Class. I believe this amount is
20 reasonable based on the amount of time and effort I have devoted to this case and the risks I have
21 undertaken as a class representative, as described above. My support for the Settlement is not
22 contingent on me receiving this enhancement payment.

23 I declare under penalty of perjury under the laws of the State of California and the United
24 States that the foregoing is true and correct. Executed on March 27, 2026, in Moreno Valley,
25 California.

26 
Ricardo Betancourth (Mar 27, 2026 16:19:02 PDT)

27 Ricardo Betancourth