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**Attorneys for Plaintiff**

Donnell Petetan

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF SAN BERNARDINO**

CESAR SANCHEZ and DONNELL  
PETETAN, an individual, and on behalf of  
himself and on behalf of all persons  
similarly situated,

Plaintiff,

vs.

CRST LINCOLN SALES, INC., an Iowa  
corporation; and DOES 1 through 50,  
inclusive,

Defendants.

Case No.: CIVSB2518258

Assigned for all purposes to Hon. Charlie L. Hill

**DECLARATION OF DONNELL PETETAN  
IN SUPPORT OF MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT**

Date: June 16, 2026

Time: 8:30 a.m.

Dept: S30

Complaint Filed: June 25, 2025

Jury Trial: None Set

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1 class action lawsuit, and what my responsibilities would be as a named plaintiff.

2 6. After the lawsuit was filed, I estimate I spent at least another two hours  
3 communicating with my attorneys. I regularly contacted and called my attorneys to get updates  
4 and provide any additional information I had obtained. I also made myself available to answer  
5 texts and emails and to have meetings with my attorneys. I answered all of my attorneys'  
6 questions about CRST to the best of my ability and did my best to seek out the information if I  
7 did not know the answer. I thought deeply about my experiences at CRST and provided relevant  
8 information about other employees, including but not limited to their departments, job titles, and  
9 job duties, wage and hour policies which effected all hourly-paid employees, and what I had  
10 personally witnessed other employees experience at work. I spent a full day—approximately eight  
11 hours—on my own looking for additional documents and gathering information to provide to my  
12 attorneys about CRST.

13 7. I made myself available all day on the day of the mediation and spent about an  
14 hour beforehand discussing what a potential settlement of the action would entail with my  
15 attorneys. I spent about two hours total reviewing the memorandum of understanding and  
16 settlement agreement, and about another half hour discussing terms of the settlement agreement  
17 with my attorneys.

18 8. I answered all of my attorneys' questions as well as I could, provided them with  
19 all of the relevant information I had—as well as the documents I could gather—researched each  
20 aspect of the lawsuit to the best of my ability, and did everything else my attorneys asked of me.  
21 I believe I did everything I could to get a fair result for the other employees. I think everything I  
22 did helped to get the result obtained in the case.

23 9. Throughout this case, I have not sought individual benefits from the lawsuit.  
24 Rather, I maintained this lawsuit because I wanted to hold CRST accountable for its unlawful  
25 conduct. I believe that I have fulfilled my responsibilities, and I will continue to fulfill those  
26 responsibilities, to the best of my ability, until the conclusion of the case.

27 10. I respectfully request that the Court approve and award me a Class Representative  
28 Service Payment in the amount of \$15,000.00 for my efforts and active participation in the case.

1 Taking into consideration the time that I dedicated to this case, I believe that this amount is  
2 reasonable.

3 11. I am not related to anyone associated with Brock & Gonzales, LLP.

4 12. I have not entered into any undisclosed agreements or received any undisclosed  
5 compensation in this case. I have no conflicts of interest with any class members or parties.

6 I declare under penalty of perjury under the laws of the State of California that the  
7 foregoing is true and correct.

8 Executed on May 19, 2026, at Flagstaff, Arizona.

9 *donnellpetetan*

10 donnellpetetan (May 19, 2026 18:14:54 PDT)

11 Donnell Petetan