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Attorneys for Plaintiffs Griselda Jauregui and Raymond Rodriguez

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

GRISELDA JAUREGUI, individually, and
on behalf of other members of the general
public similarly situated and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;
RAYMOND RODRIGUEZ, individually,
and on behalf of other members of the
general public similarly situated and on
behalf of other aggrieved employees pursuant
to the California Private Attorney General
Act;

Plaintiffs,

vs.

ROADRUNNER TRANSPORTATION
SERVICES, INC., an unknown business
entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 21STCV12728

Honorable William F. Highberger
Department 10

CLASS ACTION

**DECLARATION OF RAYMOND
RODRIGUEZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Hearing Date: September 21, 2026
Hearing Time: 11:00 a.m.
Department: 10

Complaint Filed: April 2, 2021
FAC Filed: May 21, 2025
Trial Date: None Set

DECLARATION OF RAYMOND RODRIGUEZ

I, Raymond Rodriguez, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am a named plaintiff in the above-captioned case. I originally brought a separate action against Defendant. As Part of the settlement of that action that case was dismissed and I was added as a named plaintiff to the above-captioned case, with my allegations against Defendant being incorporated. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Roadrunner Transportation Services, Inc. ("Defendant") from approximately January 2008 to approximately October 2023 as an hourly-paid, nonexempt employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for not properly compensating its employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC discussing my situation and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff and a PAGA representative. Prior to commencing my initial case and prior to joining the above-captioned case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout my prior case and inclusion in this case, I have spent time speaking with my attorneys regarding the cases and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid nonexempt employees, preparing a signed declaration in 2023 attesting to the merits of the claims, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I

1 had obtained.

2 4. Throughout this matter, I was available to answer any questions my attorneys had,
3 and available to speak and meet with my attorneys whenever they needed me. I responded to them
4 as quickly as possible and gave them as much information and identified as many documents as I
5 could. I spent time speaking with my attorneys about the cases, identifying potential witnesses,
6 providing my attorneys with documents and information concerning the cases, and also describing
7 policies, practices, and procedures of Defendant.

8 5. As far as the settlement is concerned, I was available to review documents and
9 answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the
10 Settlement Agreement and discussed the questions I had regarding the potential settlement with my
11 attorneys before signing the settlement papers.

12 6. I understand that a settlement has been reached in my case and what my duties and
13 responsibilities are as a class and PAGA representative. For example, I am aware that if the
14 settlement is granted preliminary approval, the Court will certify a class for settlement purposes,
15 and likely appoint me as a representative of the class and my attorneys as counsel for the class. I
16 also understand that my duties will include checking in on, monitoring, and conferring with my
17 attorneys to facilitate the notice and settlement administration process, and to provide information
18 that the Court needs in order to assess whether the settlement is fair, reasonable, and adequate.
19 Further, if any individuals who are potential class members contact me, I will take steps to have
20 them referred to the Court-appointed settlement administrator so that these individuals may receive
21 the necessary information and notice they may be eligible to receive in connection with the
22 settlement and contemplated final approval hearing.

23 7. I believe that I have done everything that my attorneys have asked of me and have
24 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class
25 members and the State of California with respect to aggrieved employees. I have volunteered to
26 represent and champion the interests of many other people with similar claims and injuries because
27 of the importance of the case and the necessity that all class members and aggrieved employees
28 benefit from the lawsuit equally. I understand that as a proposed class representative, and if

1 formally appointed as a class representative, I have and continue to represent the interests of all
2 members of the class in litigation to recover relief for the class. As an hourly-paid nonexempt
3 employee of Defendant who was subject to the same policies, practices, and procedures as the
4 other members of the class, I have claims that are typical of those of the class. I consider the
5 interests of the class just as I would consider my own interests. I understand that I may need to put
6 the interests of the class before my own interests, although I have no reason to believe that my
7 interests are in conflict with the interests of the class. I understand that any resolution of the
8 lawsuit is subject to court approval and must be in the best interest of the class as a whole. I have
9 participated, and continue to participate, in the lawsuit as necessary. I have actively followed and
10 monitored the progress of my initial case and the above-captioned case since joining, and have
11 taken steps to make sure that the litigation is prosecuted by the skilled and effective attorneys that I
12 have retained.

13 8. I think my efforts in my prior action and the above-captioned case helped to get the
14 result obtained in this matter, and as a potential class and PAGA representative, I respectfully
15 request that the Court award me an enhancement award for my efforts in pursuing and
16 participating in the cases, as well as my broader release of claims. Taking into consideration the
17 time that I have dedicated to this matter, I believe that the requested amount is reasonable.

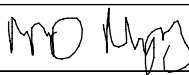
18 9. I am not related to anyone associated with Lawyers *for* Justice, PC.

19 10. I have not entered into any undisclosed agreements, nor have I received any
20 undisclosed compensation in this matter. The only compensation I will receive is whatever amount
21 the Court awards as an enhancement award, as well as my share of the settlement as a class
22 member and aggrieved employee.

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

06/08/2026

25 Executed on this ____ day of _____ 2026, at Manteca, California.

26 
27 _____
28

Raymond Rodriguez