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Attorneys for Plaintiff ARIN ESRAELIAN, as an individual, and on behalf of all employees similarly situated (*Additional Plaintiff's Counsel listed on next page*)

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SANTA CLARA

Luis Franco, individually, on behalf of himself and
all other similarly situated employees,

Plaintiff,

vs.

The Goodyear Tire and Rubber Company, an Ohio
corporation, and Does 1-5

Defendants.

CASE NO.: 22CV393403

Consolidated with:

Esraelian Case No.: 21STCV44620 and

Rodas Case No.: 21STCV28702

CLASS ACTION

**DECLARATION OF ARIN ESRAELIAN IN
SUPPORT OF PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Assigned for all purposes:

Honorable Patricia M. Lucas

Action filed: January 18, 2022

1 Luis Franco, individually, on behalf of himself
2 and all other similarly situated employees,

3 Plaintiff,

4 vs.

5 The Goodyear Tire and Rubber Company, an
6 Ohio corporation, and Does 1-5

7 Defendants.
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11 ARIN ESRAELIAN, as an individual, and on
12 behalf of all similarly situated employees,

13 Plaintiff,

14 v.

15 THE GOODYEAR TIRE & RUBBER
16 COMPANY, and DOES 1-50, inclusive,

17 Defendants.
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19 DANIEL RODAS, as an individual and on behalf
20 of all others similarly situated,

21 Plaintiffs,

22 vs.

23 THE GOODYEAR TIRE & RUBBER
24 COMPANY, an Ohio corporation; and DOES 1
25 through 50, inclusive,

26 Defendants.
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ADDITIONAL PLAINTIFFS' COUNSEL

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ATTORNEY FOR PLAINTIFF ARIN ESRAELIAN

DECLARATION OF ARIN ESRAELIAN

I, ARIN ESRAELIAN, hereby declare as follows:

1. I am an individual residing in California. I am over the age of eighteen and a Plaintiff in the case of *Franc, et al. v. The Goodyear Tire and Rubber Company*, pending in the Superior Court of the State of California, County of Santa Clara, and designated as Case No. 22CV393403. The information contained herein is based on my personal knowledge and if called as a witness I could and would testify competently hereto.

2. I was employed by Defendant The Goodyear Tire and Rubber Company (“Defendant”) from approximately January 30, 2009 through in or around December 2020 as a non-exempt hourly paid employee.

3. I believe that certain employment practices of Defendant were unlawful, including but not limited to: (1) failure to pay wages; (2) failure to provide rest periods; (3) failure to provide meal periods; (4) failure to pay wages due at separation of employment; (5) failure to provide accurate and itemized wage statements, (6) failure to reimburse for necessary business expenditures; (7) violation of Business and Professions Code section 17200 et seq.; and (8) violation of the Private Attorney General Act (“PAGA”).

4. I decided to serve as a class representative in this class action lawsuit based on these allegations and violations and agreed to serve as a Named Class Representative in order to represent other employees that I knew were similarly affected by Defendant’s conduct. I understood that by acting as the Class Representative I had a duty to protect the interests of the class even to the detriment of my own individual claims and interests.

5. I believed I could adequately represent the proposed class of employees and would prevail in my case. I believe I am an adequate class representative because my interests are the same as all current and former non-exempt employees employed by Defendant in California during the Class Period. The Class Period is August 4, 2017, through July 30, 2022.

6. I willingly and knowingly brought the claims on behalf of the Class Members. I fully understand that as class representative, I hold certain fiduciary duties to the Class Members and must always consider their interests. Throughout this lawsuit I sought the same damages and remedies,

1 specifically for unpaid wages, meal and rest period penalties, reimbursement of business expenditures,
2 penalties for failure to provide accurate itemized wages statements, and other available remedies. I
3 believe that I have diligently served as class representative in this matter. I have no claim that is
4 antagonistic to the class members.

5 7. While I did not type this declaration, I did review it completely and was given the
6 opportunity to ask questions and make changes. This is an accurate summary of the information I
7 provided to my attorneys.

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

10 Executed this 11 / 30 / 2022 day of November 2022 at CA, California.

11 *Arin Esraelian*

12 ARIN ESRAELIAN
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