

Benjamin H. Haber (SBN 315664)
benjamin.haber@wilshirelawfirm.com
Daniel J. Kramer (SBN 314625)
daniel.kramer@wilshirelawfirm.com
Chase M. Stern (SBN 290540)
chase.stern@wilshirelawfirm.com
Alan Wilcox (SBN 287476)
alan.wilcox@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
660 S. Figueroa St., Sky Lobby
Los Angeles, California 90017
Telephone (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiffs

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

DIONDRE EDWARDS and FRANCISCO
PONCE, individually, and on behalf of all others
similarly situated and other aggrieved persons,

Plaintiffs,

v.

THE GOODYEAR TIRE & RUBBER
COMPANY, a corporation; JUST TIRES, an
unknown entity; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: 24STCV16291

CLASS & REPRESENTATIVE ACTION

*[Assigned to: Hon. Samantha P. Jessner,
Dept. 7]*

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

Complaint Filed: June 28, 2024
FAC filed: September 4, 2025
Trial Date: Not set

DECLARATION OF PLAINTIFF DIONDRE EDWARDS

I, Diondre Edwards, 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 The Goodyear Tire & Rubber Company (“Defendant”). I worked for Defendant from approximately September 2023 to approximately April 2024 as an hourly-paid, non-exempt employee. 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 all of my meal and rest breaks, and all of my wages, including straight-time, overtime, and vacation pay.

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 50 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

1 calls, my attorneys and I were able to identify instances when I was not paid correctly.
2 Additionally, leading up to the mediation in February 2025, I had multiple lengthy phone calls
3 with Wilshire Law Firm regarding the claims at issue and what was to transpire at the mediation.
4 I also reached out to putative class members in order to assist with the investigation of claims in
5 this action.

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

11 9. Additionally, I made myself fully available on the day of mediation and was in
12 continuous contact with my attorneys to assist with any questions or issues that may have arisen.

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

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

22 12. I also understand that there was financial risk in bringing this lawsuit. For example,
23 I knew that if I did not prevail in this lawsuit that I could potentially be responsible for Defendant's
24 attorneys' fees and costs. Additionally, I understood that this matter would take time, and the
25 difficult financial circumstances that I had to endure following my termination from Defendant
26 which included difficulties paying rent, utilities, and daily expenses due to lengthy unemployment,
27 would not be resolved expeditiously.

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13. I understand that the settlement agreement provides a service payment to me of up to \$10,000.00. 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 settlement requires that I enter into a general release, which I understand is broader than the release that will bind other class members. I am receiving no additional compensation to that provided for in the settlement.

14. Based on my involvement in this case and the benefits provided to my former co-workers, I can say I helped stand up for the other workers who were too afraid to say anything to management because they did not want to risk losing their jobs or risk the stigma of suing an employer. I was not afraid to take that risk because I strongly care about helping out my former co-workers.

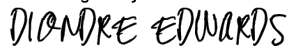
15. I reviewed (and ultimately signed) the Class Action and PAGA Settlement Agreement in full and my attorneys answered all the questions I had. I believe the settlement terms and allocations are fair, adequate, and reasonable given the strength of the class claims and Defendant's defenses.

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

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

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

Executed on 9/5/2025, at Hawthorne, California.

DocuSigned by:

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 Diondre Edwards