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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN BERNARDINO**

WILLIAM TOWNSEND, individually,  
and on behalf of other aggrieved  
employees pursuant to the California  
Private Attorneys General Act;

Plaintiff,

vs.

LINDE INC, a Delaware corporation; LINDE  
GAS & EQUIPMENT INC, a Delaware  
corporation; and DOES 1 through 100,  
inclusive,

Defendants.

Case No.: CIVSB2504690

Honorable Joseph B. Widman  
Department S36

**CLASS ACTION**

**DECLARATION OF WILLIAM  
TOWNSEND IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION AND PAGA  
SETTLEMENT**

Hearing Date: September 22, 2026  
Hearing Time: 9:00 a.m.  
Department: S36

Complaint Filed: February 14, 2025  
Trial Date: None Set

**DECLARATION OF WILLIAM TOWNSEND**

I, William Townsend, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case as well as *William Townsend v. Linde Inc., et al.*, San Bernardino Superior Court, Case No. CIVSB2504057 initiated on February 10, 2025 and removed to the United States District Court for the Central District of California, Case No. 5:25-cv-01143-DSF-AJR (the "Class Action"). 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 Linde Inc. ("Defendant") from approximately April 2018 to approximately October 2024 as an hourly-paid, non-exempt Truck Driver. 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, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative. Prior to commencing the cases, 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 the cases, 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 non-exempt employees employed by Defendant in California, 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 had obtained.

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

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

6. I think my efforts helped to get the result obtained in the matters, and as a potential class and PAGA representative, I respectfully request that the Court award me Class Representative Service Payment for my efforts in pursuing and participating in the matters, as well as my broader release of claims. Taking into consideration the time that I have dedicated to the matters, I believe that this amount is reasonable.

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

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in the matters. The only compensation I will receive is whatever amount the Court awards as a class representative service payment, as well as my share of the settlement as a Class Member and Aggrieved Employee.

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

08/27/2026

Executed on this \_\_\_\_ day of August 2026, at Fontana, California.

Electronically Signed 2026-08-27 20:08:38 UTC - 76.86.139.11  
Nintex AssureSign 68921d16-4204-411d-8e02-04b30017ed50

William Townsend