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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN JOAQUIN

JUAN JIMENEZ-PADILLA, an individual; on
behalf of Plaintiffs, and on behalf of all persons
similarly situated,

Plaintiff,

v.

SANDAIR CORPORATION d.b.a.
CALIFORNIA FREIGHT SALES, a California
corporation; SUPERIOR TRUCK LINES,
INC., a California corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. STK-CV-UOE-2025-0009283

**DECLARATION OF JUAN JIMENEZ-
PADILLA IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Judge: Hon. Esmeralda Zendejas
Dept.: 11A

1 I, JUAN JIMENEZ-PADILLA declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am a named Plaintiff in the above
4 wage and hour class and PAGA action filed against Defendant Sandair Corporation, dba California
5 Freight Sales (“Defendant”).

6 2. This declaration is being submitted in support of Plaintiff’s Motion for Preliminary
7 Approval of Class Action and PAGA Settlement.

8 3. I seek to represent “all individuals who are or previously were employed by Defendant
9 in California and classified as non-exempt employees (“Class Members”) during the period from July
10 7, 2021, through June 6, 2026 (“Class Period”). I believe that I am, have been, and will continue to
11 represent the interests of the class fairly and adequately. I have claims that are typical of the claims
12 the Class Members that I am seeking to represent.

13 4. I worked for Defendant as a non-exempt employee in California from September 2024
14 through January 2025. At all times during my employment, I was classified by Defendant as a non-
15 exempt employee, paid on an hourly basis, and was entitled to legally compliant meal and/or rest
16 periods, and minimum and overtime wages for all hours worked. Throughout my employment, I was
17 subject to Defendant’s written policies and procedures.

18 5. Generally, my lawsuit claims that Defendant failed to pay for all hours worked, failed
19 to provide compliant meal and rest periods, failed to properly calculate the regular rate of pay for
20 purposes of overtime and redeemed sick pay, failed to reimburse employees for required business
21 expenses, failed to furnish accurate itemized wage statements, and failed to timely pay all wages due
22 upon separation of employment.

23 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
24 to represent because I was subject to the same alleged unlawful employment policies and practices at
25 issue in this action, including but not limited to, Defendant’s failure to provide complaint meal and
26 rest periods, failure to reimburse for mandatory business expenses, failure to accurately calculate the
27 regular rate of pay for purposes of overtime and redeemed sick pay, failure to furnish accurate itemized
28 wage statements, failure to pay for all hours worked, and failure to pay all wages when due. Factually,

1 Defendant's policies and practices apply class wide, and Defendant's liability can be determined by
2 facts common to all members of the Class.

3 7. Further, there is no conflict between my interests and the interests of the class that I am
4 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that
5 I was injured by the same company-wide policies and practices to which the proposed Class was
6 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
7 of the Class by initiating this litigation, undertaking extensive class discovery, and evaluating the
8 proposed settlement to assure that it is fair.

9 8. I understood that at the time I filed this action, as a Class Representative, I owed a duty
10 to the putative class members to faithfully prosecute this action with their best interests at the forefront
11 of every decision. I understood that I could not make any decision in this action for the sole benefit
12 of my personal interest. I understood that in executing this duty, I might have been asked to sacrifice
13 my personal best interests for the benefit of the interests of the putative class members. Nevertheless,
14 I knowingly and voluntarily undertook this duty in order to provide the broadest possible relief for my
15 former co-workers for what I perceived to be Defendant's unlawful wage and hour practices. I believe
16 that I faithfully executed the duties of a Class Representative throughout this litigation and will
17 continue to do until this litigation is fully and finally resolved.

18 9. I believe that the proposed settlement before the Court is fair, reasonable, and adequate,
19 and made in the best interest of the Settlement Class Members. Consequently, I respectfully, and
20 humbly, ask the Court to grant preliminary approval of the Settlement and all of its terms.

21
22 I declare under the penalty of perjury under the laws of the State of California that the foregoing
23 is true and correct. Executed 08/18/2026 (date), at Hanford ca (location),
24 California.

25
26 By:  Juan Jimenez (Aug 18, 2026 13:42:28 PDT)
27 JUAN JIMENEZ-PADILLA
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