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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF RIVERSIDE

RAUL SERRANO, an individual, on behalf of
himself, and on behalf of all persons similarly
situated;

Plaintiff,

v.

DELUXE AUTO CARRIERS, INC. a
California corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. CVRI2402625

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

Date: August 20, 2025

Time: 8:30 A.M.

Judge: Hon. Harold W. Hopp

Dept.: 1

1 I, Raul Serrano 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 the named Plaintiff in the above
4 wage and hour class and PAGA action filed against DELUXE AUTO CARRIERS, INC., (hereinafter
5 “Defendant”).

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

8 3. I believe that I am, have been, and will continue to represent the interests of the class
9 fairly and adequately. I have claims that are typical of the claims the Class Members that I am seeking
10 to represent.

11 4. I have worked for Defendant as a non-exempt Car Hauler in California since January of
12 2021. At all times during my employment, I earned an hourly wage and was entitled to minimum,
13 regular, and overtime wages for all hours worked. Throughout my employment, I was subject to
14 Defendant’s written policies and procedures.

15 5. Generally, my lawsuit claims that Defendant failed to pay all wages when due, failed to
16 furnish accurate, itemized wage statements, failed to pay for all time worked, failed to pay for all time
17 worked, failed to reimburse necessary business expenses, failed to provide compliant meal and rest
18 periods. Defendant denies liability for each of my claims.

19 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
20 to represent because I was subject to the same alleged unlawful employment policies and practices at
21 issue in this action, including but not limited to, Defendant’s failure to pay all wages when due, failed
22 to furnish accurate, itemized wage statements, failed to pay for all time worked, failed to pay for all
23 time worked, failed to reimburse necessary business expenses, failed to provide compliant meal and rest
24 periods. Factually, Defendant’s policies and practices apply class wide, and Defendant’s liability can
25 be determined by facts common to all members of the Class.

26 7. Further, there is no conflict between my interests and the interests of the class that I am
27 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that
28 I was injured by the same company-wide policies and practices to which the proposed Class was

1 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
2 of the Class by initiating this litigation and evaluating the proposed settlement to assure that it is fair.

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

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

15 10. Once preliminary approval of the Settlement is granted, my counsel will file a formal
16 motion for the negotiated Class Representative Service Award. This motion will be accompanied by a
17 further declaration from me that describes the services I performed to prosecute this action, includes an
18 estimate of time I spent performing these services, the risks I assumed or benefits I received in
19 prosecuting this action. This declaration will also identify any adverse consequences I suffered in
20 prosecuting this action.

21 11. I am not a named plaintiff in any other class or PAGA case, pending or closed.

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 on 07/21/2025(date), at Palmdale (city), California.

24
25 By:  _____
26 RAUL SERRANO
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