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Attorneys for Plaintiff, DAVID RAYMOND TINCUP JR.
 on behalf of himself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SACRAMENTO

DAVID RAYMOND TINCUP JR., on behalf of
 himself and all others similarly situated,

Plaintiff,

v.

PCA CENTRAL CALIFORNIA
 CORRUGATED, LLC d/b/a PACKAGING
 CORPORATION OF AMERICA, a Delaware
 corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 34-2022-00318214
 Assigned for All Purposes To:
 Hon. Lauri A. Damrell
 Dept. 22

**DECLARATION OF DAVID RAYMOND
 TINCUP JR. IN SUPPORT OF
 PLAINTIFF'S MOTION FOR
 PRELIMINARY APPROVAL OF CLASS
 ACTION AND PAGA SETTLEMENT**

DECLARATION OF DAVID RAYMOND TINCUP JR.

I, David Raymond Tincup Jr., declare as follows:

1. I am a named Plaintiff and Class Representative in the cases of *David Raymond Tincup Jr. v. PCA Central California Corrugated, LLC d/b/a Packaging Corporation Of America*. (Sacramento County Case Nos. 34-2022-00318214). I make this declaration on the basis of my personal knowledge and if asked to testify thereto I could and would do so.

2. I was employed by Defendant PCA Central California Corrugated, LLC d/b/a Packaging Corporation of America ("PCA" and/or "Defendant") from on or about from or about November 2016 through on or about September 8, 2021. During my employment, I occupied a non-exempt, hourly position as a Stacker Operator where I checked the measurements of orders, inspected orders for quality, and cleaned the areas where orders were measured and inspected for accuracy.

3. Prior to retaining the law firm of James Hawkins APLC to redress the grievances that I had against PCA, I was made aware of the advantages and disadvantages of litigation. I was also made aware of my responsibilities as both a Plaintiff and a class and PAGA representative prior to filing the class action complaint which was filed on or about September 8, 2022. I accepted the responsibility and agreed to move forward. I pledged to participate actively in the lawsuit.

4. During the litigation of this case, I have continuously interacted with my attorneys to discuss the status of the cases. I provided relevant oral and documentary information necessary to prosecute this case. By way of example, I searched for and provided relevant documents pertaining to my employment with Defendant and engaged in numerous discussions with my attorneys regarding my employment. These discussions include, but are not limited to, the following topics: the policies, practices and specific working conditions under Defendant. I have also had numerous discussions with my attorneys regarding the progress of this case including during both mediations. I have spent approximately 40 to 45 hours assisting my attorneys in their litigation of this case.

5. By agreeing to bring this action, I formally accepted the responsibilities of representing the interests of all similarly situated employees in California and willingly chose to assume risks and potential costs that I alone might have to bear if judgement would have been rendered in favor of Defendant.

6 As part of the settlement agreement, I also signed a general release releasing all claims I have or may have against PCA which is far broader than the release by class members. The class representative service payment also serves as compensation for agreeing to a full, general release of all claims against PCA.

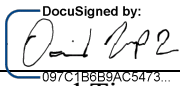
7. I also risked the potential stigma of being a named plaintiff in a representative action labor dispute which could affect my further employability in the industry or with any prospective employer who learns of my lawsuit against a former employer.

8. The class representative service payment, subject to court approval, is Ten Thousand Dollars (\$10,000). I believe that this amount is fair and reasonable in light of the risks undertaken (both personal and financial) in litigating these matters as class action and PAGA representative, as well as the time and effort I have expended in doing so, which have resulted in a favorable outcome to the class members and aggrieved employees.

9. I have not directly experienced negative affect(s) in relation to any further employment opportunities because of this lawsuit. However, I did risk negative effects on my employability when I formally accepted the responsibilities of a class representative and willingly chose to assume significant risks and potential costs that I alone might have had to bear if judgement would have been rendered in favor of Defendant.

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

Executed on November 19, 2025, at Kingsburg, California.

DocuSigned by:

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 David Raymond Tincup Jr.