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Attorneys for Plaintiff ALAN CARRILLO RODRIGUEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN JOAQUIN

ALAN CARRILLO RODRIGUEZ, an
individual, on behalf of himself and on behalf
of all persons similarly situated,

Plaintiff,

v.

TITAN WORKFORCE, a California
Corporation; and DOES 1-50, Inclusive,

Defendants.

Case No. STK-CV-UOE-2022-0003036

**DECLARATION OF ALAN CARRILLO
RODRIGUEZ IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: October 23, 2023

Time: 8:45 a.m.

Judge: Hon. Barbara Kronlund
Dept.: 10D

1 I, ALAN CARRILLO RODRIGUEZ, 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 lead named Plaintiff in the
4 above wage and hour class action filed against TITAN WORKFORCE, a California corporation
5 (hereinafter “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 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 worked for Defendant as a non-exempt employee in California from August of 2021
12 to November of 2021. At all times during my employment, I was denied legally complaint meal and
13 rest periods, minimum and regular wages. Throughout my employment, I was subject to Defendant’s
14 written policies and procedures contained in, among other documents, the “Employee Handbook.”

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

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

25 7. Further, there is no conflict between my interests and the interests of the class that I am
26 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that
27 I was injured by the same company-wide policies and practices to which the proposed Class was
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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, undertaking extensive class discovery, and evaluating the
3 proposed settlement to assure that it is fair.

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

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

16 I declare under the penalty of perjury under the laws of the State of California that the foregoing
17 is true and correct. Executed Sep 15, 2023, at Oakland, California.

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19 By: Alan Carrillo (Sep 15, 2023 09:40 PDT)
20 ALAN CARRILLO RODRIGUEZ
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