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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

ALEXANDER PEGUES, JR. and MANOLO PEREZ, individuals, on behalf of themselves and on behalf of all persons similarly situated,

Plaintiffs,

v.

ELINK RECRUITING SOLUTIONS, INC., a Georgia Corporation; GLOBAL MAIL, INC., an Ohio Corporation; and DOES 1-50, Inclusive,

Defendants.

Case No. 22STCV18259

DECLARATION OF MANOLO PEREZ IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Date: August 28, 2025

Time: 10:30 a.m.

Judge: Hon. Carolyn B. Kuhl

Dept.: 12

1 I, MANOLO PEREZ, 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 action filed against ELINK RECRUITING SOLUTIONS, INC., and GLOBAL
5 MAIL, INC. (hereinafter “Defendants”).

6 2. This declaration is being submitted in support of Plaintiffs’ 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 Defendants as an hourly, non-exempt employee from July of 2022 to
12 September of 2022. At all times during my employment, I earned an hourly wage, and was entitled to
13 legally compliant meal and/or rest periods, and minimum, regular and overtime wages for all hours
14 worked. Throughout my employment, I was subject to Defendants’ written policies and procedures
15 contained in, among other documents, the “DHL eCommerce Employee Handbook.”

16 5. Generally, my lawsuit claims that Defendants failed to pay for all time worked,
17 including overtime, failed to provide compliant meal and rest periods, failed to reimburse necessary
18 business expenses, and failed to pay all wages due.

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, Defendants’ failure to provide compliant meal and
22 rest periods, failure to pay for all hours worked, failure to reimburse necessary business expenses, and
23 failure to pay all wages due. Factually, Defendants’ policies and practices apply class wide, and
24 Defendants’ liability can be determined by 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
28 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests

1 of the Class by initiating this litigation, undertaking extensive class discovery, and evaluating the
2 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 Defendants' 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, I ask the Court to grant preliminary approval of the Settlement and all of its terms.

15 I declare under the penalty of perjury under the laws of the State of California that the foregoing
16 is true and correct. Executed 06/06/2025, at Saginaw, Michigan.

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18 By: 
Manolo Perez (Jun 6, 2025 21:03 EDT)
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