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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

ROBERT PEREZ, and TROY GEAR,
individuals, on behalf of themselves, and on
behalf of all persons similarly situated,

Plaintiffs,

vs.

GO CAR WASH MANAGEMENT CORP., a
Delaware corporation; GO CAR WASH
CALIFORNIA LLC, a Delaware limited
liability company; and DOES 1-50, Inclusive,

Defendants

Case No: CIVSB2333340

**DECLARATION OF TROY GEAR, IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PAGA ACTION SETTLEMENT**

Date: February 11, 2026

Time: 8:30am

Judge: Hon. Jeffrey R. Erickson

Dept.: S14

1 I, Troy Gear, 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 action filed against Go Car Wash Management Corp., a Delaware corporation; Go
5 Car Wash California LLC, a Delaware limited liability company (“Defendants”).

6 2. This declaration is being submitted in support of Plaintiffs’ Motion for Preliminary
7 Approval of Class and PAGA Action 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 a non-exempt employee, paid on an hourly basis in addition
12 to non-discretionary bonuses in San Bernardino county between April 2024 through October 2024. At
13 all times during my employment, I was paid on an hourly basis in addition to earning non-discretionary
14 bonuses and was entitled to legally compliant meal and/or rest periods, and minimum, regular and
15 overtime wages for all hours worked. Throughout Plaintiffs’ employment, Plaintiffs were subject to
16 Defendants’ written policies and procedures contained in, among other documents, the “Teammate
17 Handbook.”

18 5. Generally, my lawsuit claims that Defendants failed to properly calculate the regular
19 rate of pay for purposes of overtime, double time, meal period premiums, and sick pay, failed to
20 provide them with legally compliant meal and rest breaks, failed to pay employees for all time worked,
21 failed to reimburse for required business expenses, failed to provide accurate itemized wage
22 statements, and failed to timely pay wages due 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, Defendants’ failure to include commissions and non-
26 discretionary bonuses into the regular rate of pay for the purposes of overtime, double time, meal
27 period premiums, and redeemed sick pay, failure to provide meal breaks and rest breaks, and failure

1 to reimburse employees for mandatory business expenses, failure to issue accurate itemized wage
2 statements, and failure to pay wages when due. Factually, Defendants' policies and practices apply
3 class wide, and Defendants' liability can be determined by facts common to all members of the Class.

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

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

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

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10. Further, I support my attorneys' application for Attorneys' Fees in the amount of \$133,333.33 for attorneys' fees (one-third of the Gross Settlement Amount) and *up to* \$30,000.00 for reimbursement of actually incurred litigation expenses. I understand that the attorneys' fees portion of the Attorneys' Fees shall be divided 50% to JCL Law Firm, APC, and 50% to Zakay Law Group, APLC, and I expressly consent to this division of fees

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 10/31/2025 (Date), in 10/31/2025, (City) California.

By: Troy Gear
Troy Gear (Oct 31, 2025 15:38:48 PDT)