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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

KEVIN DION COCROFT and EFRAIM
ALVARADO, individuals, on behalf of
himself, and on behalf of all persons similarly
situated,

Plaintiffs,

v.

EQUIPMENTSHARE.COM INC., and DOES
1-50, Inclusive,

Defendants.

Case No. 37-2024-00021084-CU-OE-CTL

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

Date: June 6, 2025

Time: 10:30 a.m.

Judge: Hon. Loren Freestone

Dept.: C-64

1 I, EFARIM ALVARADO, 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 one of the named Plaintiffs in the
4 above wage and hour class and PAGA action filed against Equipmentsshare.com Inc. (hereinafter
5 “Defendant”).

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 fairly
9 and adequately. I have claims that are typical of the claims the Class Members that I am seeking to
10 represent.

11 4. I worked for Defendant as a non-exempt employee in California from July of 2023 through
12 February 2024. During my employment, I was entitled to legally compliant meal and rest periods,
13 minimum wages and overtime compensation. Throughout my employment, I was subject to Defendant’s
14 written policies and procedures.

15 5. Generally, my lawsuit claims that Defendant failed to pay the correct regular rate of pay,
16 failed to pay for all time worked, failed to provide compliant meal and rest periods, failed to reimburse
17 necessary business expenses, failed to furnish accurate itemized wage statements, and failed to pay all
18 wages upon separation.

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 provide compliant meal and rest
22 periods, failure to furnish accurate itemized wage statements, failure to pay for all hours worked, failure
23 to reimburse necessary business expenses, failure to calculate the correct rate of pay, and failure to pay
24 all wages when due. Factually, Defendant’s policies and practices apply class wide, and Defendant’s
25 liability can 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 I
28 was injured by the same company-wide policies and practices to which the proposed Class was subjected

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

3 8. I understood that at the time I was added to this action, as a Class Representative, I owed
4 a 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 practices.
10 I believe that I faithfully executed the duties of a Class Representative throughout this litigation and will
11 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 humbly,
14 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 05/13/2025, at El Cajon (City/Location),
17 California.

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19 By: 
EFARIM ALVARADO
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