

**MARLIN & SALTZMAN**

Stanley D. Saltzman, Esq. (SBN 90058)  
Adam M. Tamburelli, Esq. (SBN 301902)  
29800 Agoura Road, Suite 210  
Agoura Hills, California 91301  
Telephone: (818) 991-8080  
Facsimile: (818) 991-8081  
ssaltzman@marlinsaltzman.com  
atamburelli@marlinsaltzman.com

**THE CULLEN LAW FIRM, APC**

Paul T. Cullen, Esq. (SBN 193575)  
19360 Rinaldi Street, #647  
Porter Ranch, California 91326  
Telephone: (626) 744-9125  
Facsimile: (626) 744-9436  
paul@cullenlegal.com

*Attorneys for Plaintiffs and the Class*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

GERARDO ORTEGA, AND  
MICHAEL D. PATTON, individually  
and on behalf of themselves, all others  
similarly situated, and the general  
public,

Plaintiffs,

v.

J. B. HUNT TRANSPORT, INC., an  
Arkansas corporation; and DOES 1 to  
100, inclusive,

Defendants.

**CASE NO. 07-CV-08336-RGK-AFM**  
(Hon. R. Gary Klausner)

**DECLARATION OF STANLEY D. SALTZMAN IN  
SUPPORT OF PLAINTIFFS' MOTION FOR FINAL  
APPROVAL OF CLASS ACTION SETTLEMENT**

DATE: February 11, 2019

TIME: 9:00 a.m.

CTRM: 850

Trial: February 19, 2019

1 **DECLARATION OF STANLEY D. SALTZMAN**

2 I, STANLEY D. SALTZMAN, declare as follows:

3 1. I am an individual over the age of 18. I am a California bar-admitted attorney  
4 and am a partner in the firm of Marlin & Saltzman, LLP. I am also admitted to practice  
5 before the various district courts within California, including the Central District where  
6 this matter is venued. I am one of the attorneys of record for Plaintiffs in this action. I  
7 have personal knowledge of the facts set forth below and if called to testify I could and  
8 would do so competently.

9 2. This Declaration is made in support of Plaintiffs’ Motion for Final Approval  
10 of Class Action Settlement.

11 3. On December 19, 2018, my law firm provided notice of the proposed  
12 settlement to the California Department of Labor and Workforce Development (“LWDA”)  
13 pursuant to Labor Code § 2699(1). As of the date of this filing, I have received no response  
14 from the LWDA.

15 4. My firm and I have been involved in dozens of settlements in wage and hour  
16 cases since CAFA was enacted in 2005, and no State or Federal official has *ever* responded  
17 to a CAFA notice in any of our cases, be they large or small, including settlements in  
18 excess of one hundred million dollars. I have no reason to believe that this non-  
19 reversionary, non-claims made Settlement, affording considerable relief to the decertified  
20 class, would be any different.

21 I declare under penalty of perjury under the laws of the state of California that the  
22 foregoing is true and correct and that this declaration was executed on this 18th day of  
23 January, 2018, in Agoura Hills, California.

24 \_\_\_\_\_  
25 /s/ Stanley D. Saltzman

26 Stanley D. Saltzman, Esq.