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*Attorneys for Plaintiffs and the Putative Class*

(Additional counsel for Plaintiffs Listed on Signature Page)

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

CURTIS MARKSON, MARK  
MCGEORGE, CLOIS MCCLENDON,  
and ERIC CLARK, individually and on  
behalf of all others similarly situated,

Plaintiffs,

vs.

CRST INTERNATIONAL, INC., CRST  
EXPEDITED, INC.; C.R. ENGLAND,  
INC., WESTERN EXPRESS, INC.,  
SCHNEIDER NATIONAL CARRIERS,  
INC., SOUTHERN REFRIGERATED  
TRANSPORT, INC., COVENANT  
TRANSPORT, INC., PASCHALL  
TRUCK LINES, INC., STEVENS  
TRANSPORT, INC., and DOES 1-10,  
inclusive,

Defendants.

CASE NO.: 5:17-cv-01261-SB (SPx)

**DECLARATION OF CLOIS  
MCCLENDON IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
ATTORNEYS' FEES AND COSTS**

Judge: Hon. Stanley Blumenfeld, Jr.  
Date: July 29, 2022  
Time: 8:30 a.m.  
Location: Courtroom 6C  
350 West 1st Street  
Los Angeles, CA 90012

Discovery Cutoff Date: 7/2/2021  
Pretrial Conference Date: TBD  
Trial Date: TBD

1 I, Clois McClendon, declare as follows:

2 1. The facts set forth herein are true of my own personal knowledge, and if  
3 called upon to testify thereto, I could and would competently do so under oath.

4 2. I am one of the four named Plaintiffs in this action.

5 3. Throughout this case, I have understood and appreciated my role and  
6 responsibilities as a class representative. I have understood that it is my responsibility  
7 to look out for the best interests of all class members and to not put my own interests  
8 ahead of theirs. I have willingly and knowingly accepted these responsibilities and  
9 have carried them out to the best of my ability.

10 4. In 2017, prior to bringing this lawsuit, I interviewed attorneys and  
11 ultimately selected Mayall Hurley, P.C., Ackermann & Tilajef, P.C., and Melmed Law  
12 Group P.C. to represent myself and the Class. It is my understanding that Mayall  
13 Hurley, P.C., Ackermann & Tilajef, P.C. and Melmed Law Group, P.C. are experienced  
14 in litigating class actions.

15 5. In or around June 2018, I also retained Susman Godfrey, L.L.P. to  
16 represent me. It is my understanding that Susman Godfrey, L.L.P. is experienced in  
17 litigating class actions, particularly anti-trust matters.

18 6. On July 26, 2018, I filed this lawsuit as a class action. By deciding to file  
19 the lawsuit as a class action, I agreed to pursue not only my own claims, but also the  
20 claims of all similarly situated individuals. In so doing, I agreed to put the interests of  
21 the class ahead of my own. I also agreed to participate actively in the lawsuit and to  
22 assume the risks of serving as a named Plaintiff and class representative.

23 7. Since hiring Susman Godfrey, L.L.P., Mayall Hurley, P.C., Ackermann &  
24 Tilajef, P.C., and Melmed Law Group P.C. I have been in regular contact with my  
25 attorneys and participated closely with them in all phases of this litigation. I have spent  
26 considerable time helping the Class of individuals I seek to represent win compensation  
27 from the Settling Defendants. The tasks I have been actively involved in included, but  
28 are not limited to:

- 1 a. Interviewing and selecting Class Counsel;
- 2 b. Providing documents to Class Counsel relevant to the claims at issue;
- 3 c. Providing statements of factual details to Class Counsel to assist them in
- 4 understanding the nature of the Class' claims and to assist them in assessing potential
- 5 damages;
- 6 d. Assisting in the preparation of the class action and the subsequent
- 7 amendments;
- 8 e. Reviewing documents and policies produced by Defendants with Class
- 9 Counsel to assist them;
- 10 f. Reviewing discovery responses to ensure accuracy;
- 11 g. Traveling to, preparing for, and participating in a full day deposition in May
- 12 2021;
- 13 h. Preparing for and participating telephonically in the mediations on behalf of
- 14 the Class;
- 15 i. Participating in the settlement negotiations that culminated with the
- 16 Settlements; and
- 17 j. Following up with Class Counsel on a regular basis to check in regarding
- 18 the status of the case and whether anything further was needed of me.

19 8. Overall, I estimate that I have spent in excess of 200 hours of my time to  
20 help vindicate the rights of the Class.

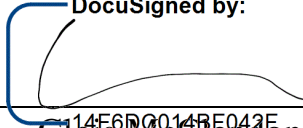
21 9. Although this case has been actively litigated for more than 5 years, I have  
22 and remain willing to continue to pursue the claims against the Non-Settling  
23 Defendants.

24 I declare under penalty of perjury under the laws of the United States and the State  
25 of California that the foregoing is true and correct.

6/13/2022

Executed on \_\_\_\_\_ in Las Vegas, Nevada.

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Clois McClendon