

# EXHIBIT

# A

**ATTACHMENT – PLAINTIFFS' EXHIBIT 90**

**Amended to Reflect Interest Calculated up to March 2, 2017**

**Plaintiff JOSE RAMIREZ**

**Claim Period: May 13, 2011 to May 13, 2014**

\$145,840.87 in unlawful deductions (wages)

\$ 17,242.88 additional unlawful deductions for the truck lease payments (wages)

\$ 11,776.30 in reimbursable expenses

\$ 45,752.32 in interest on the wages (5/13/14 - 03/02/17)

**\$220,612.37 Total**

**Plaintiff MAURICIO RODRIGUEZ**

**Claim Period: April 10, 2011 through April 10, 2014**

\$218,638.89 in unlawful deductions (wages)

\$ 15,444.54 additional unlawful deductions for the truck lease payments (wages)

\$ 503.18 in reimbursable expenses

\$ 67,785.41 in interest on the wages (4/10/14-03/02/17)

**\$302,372.02 Total**

**Plaintiff JOSE PERAZA**

**Claim Period: January 23, 2011 through January 23, 2014**

\$153,667.79 in unlawful deductions (wages)

\$ 18,262.61 additional unlawful deductions for the truck lease payments (wages)

\$ 53,411.40 in interest on the wages (1/23/14-03/02/17)

**\$225,341.80 Total**

**Plaintiff MARIO ALBA**

**Claim Period: November 2010 through August 3, 2012**

[WAGES RE-CALCULATED AMOUNT only reflects one truck and only expenses and deductions attributed to Mario Alba, not secondary drivers.

Expenses calculated based on receipts and submitted and divided by two trucks and also attributed to Mario Alba, not secondary drivers.]

\$55,937.88 in unlawful deductions (wages)

\$ 7,214.40 additional unlawful deductions for the truck lease payments (wages)

\$ 3,260.56 in reimbursable expenses

\$31,053.50 in interest on the wages (4/2/12-03/02/17)

\$ 5,067.90 in waiting time penalties<sup>1</sup>

**\$102,534.24 Total**

<sup>1</sup> The penalties are based on Plaintiffs JOSE ALBA and MARIO ALBA'S per diem wage rate. This per diem rate is then multiplied by the number of days of nonpayment following the date the wages became due, up to a maximum of 30 calendar days. *Mamika v. Barca* (1999) 80 Cal.Rptr.2d 175. Here, since payment still has not been made, the per diem rate is multiplied by 30 days for a total of \$8,648.10 owed to Plaintiff JOSE ALBA and \$5,067.90 owed to Plaintiff MARIO ALBA on section 203 penalties.

**ATTACHMENT – PLAINTIFFS' EXHIBIT 90**

**Amended to Reflect Interest Calculated up to March 2, 2017**

**Plaintiff JOSE ALBA**

**Claim Period: January 1, 2010 to September 17, 2012**

[WAGES RE-CALCULATED AMOUNT only reflects one truck and only expenses and deductions attributed to Jose Alba, not secondary drivers. Expenses calculated based on receipts submitted and divided by eight trucks and also attributed to Jose Alba, not secondary drivers]

\$103,561.23 in unlawful deductions (wages)

\$ 15,751.44 additional unlawful deductions for the truck lease payments (wages)

\$ 567.31 in reimbursable expenses

\$ 53,186.63 in interest on the wages (9/17/12-03/02/17)

\$ 8,648.10 in waiting time penalties

**\$181,714.71 Total**

**TOTAL: \$1,032,575.14 + \$400,000 in estimated attorney fees = \$1,416,309.04**