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*Attorneys for* Plaintiff MEAGAN HERNANDEZ

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF ALAMEDA**

MEAGAN HERNANDEZ, individually, and on  
behalf of other members of the general public  
similarly situated; E'MONII CRUMBY,  
individually, and on behalf of all other members of  
the general public similarly situated,

Plaintiffs,

vs.

PELTON INTERACTIVE, INC., an unknown  
business entity; and DOES 1 through 100, inclusive,

Defendants.

MEAGAN HERNANDEZ, E'MONII CRUMBY,  
individually, and on behalf of other aggrieved  
employees pursuant to the California Private  
Attorneys General Act,

Plaintiffs,

vs.

PELTON INTERACTIVE, INC., an unknown  
business entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: RG20053333 (lead case)  
Case No.: RG20061729

Honorable Frank Roesch  
Department 17

**CLASS ACTION**

**DECLARATION OF MEAGAN  
HERNANDEZ IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

[Notice of Motion and Motion for  
Preliminary Approval of Class Action  
Settlement; Declaration of Proposed  
Class Counsel (Edwin Aiwazian); and  
[Proposed] Order filed concurrently  
herewith]

**Reservation No.: R-2295005**

Date: October 28, 2021  
Time: 9:00 a.m.  
Department: 17

**DECLARATION OF MEAGAN HERNANDEZ**

I, **Meagan Hernandez**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the consolidated class and representative action case entitled *Hernandez v. Peloton Interactive, Inc.*, Superior Court of California for the County of Alameda, Case Nos. RG20053333 and RG20061729. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendant Peloton Interactive, Inc. (“Peloton”) in an hourly-paid, non-exempt position from approximately January 2019 to approximately April 2019. I decided to seek legal advice about my work experiences with Peloton and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Peloton paid me and other employees what was owed to us, and was held accountable for its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 5 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 6 hours discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it means to be a named plaintiff, a class representative, and eventually a PAGA representative.

3. I have spent over 16 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Peloton, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of non-exempt and hourly-paid employees, and helping develop a strategy as to what documents and information to obtain from Peloton. I routinely checked in with my attorneys and their staff to make sure that they were updated with my most current information and any additional information that I had obtained.

1           4.       Throughout the cases, I was available to answer any questions my attorneys had,  
2 and available to speak and meet with my attorneys whenever they needed me. I responded to  
3 them as quickly as possible and gave them as much information and identified as many  
4 documents as I could. I spent at least 13 additional hours speaking with my attorneys about the  
5 cases, identifying potential witnesses, providing my attorneys with documents and information  
6 concerning the cases, and also describing policies, practices, and procedures of Peloton. During  
7 the discovery phase of the litigation, I spent approximately 7 additional hours reviewing  
8 Peloton's discovery requests, and locating and providing documents to my attorneys.

9           5.       On October 23, 2020, I attended a full day of deposition that lasted approximately  
10 6 hours. I spent at least 4 hours preparing for the deposition and approximately 2 additional  
11 hours traveling to and from the deposition. After the deposition, I spent at least 2 hours  
12 reviewing my testimony and discussing the contents of the depositions transcript with my  
13 attorneys.

14           6.       As far as the settlement is concerned, I was available to review documents and  
15 answer any questions my attorneys had. I spent about 2 hours reviewing the settlement papers  
16 and another hour asking questions and discussing the potential settlement with my attorneys  
17 before signing the settlement agreement.

18           7.       I believe that I have done everything that my attorneys have asked of me and have  
19 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees  
20 and the State of California. I think my efforts helped to get the result obtained in this matter, and  
21 as the sole class and PAGA representative, I respectfully request that the Court award me an  
22 enhancement payment in the amount of \$10,000.00 for my active participation in the litigation.  
23 Taking into consideration the time that I have dedicated to the matter, I believe that this amount  
24 is reasonable.

25           8.       I am not related to anyone associated with Lawyers *for* Justice, PC.

26           9.       I have not entered into any undisclosed agreements, nor have I received any  
27 undisclosed compensation in this matter. The only compensation I will receive is whatever  
28

1 amount the Court awards as an enhancement payment, as well as my individual settlement  
2 payment.

3 I declare under penalty of perjury under the laws of the State of California that the  
4 foregoing is true and correct.

5 Executed this <sup>08/09/2021</sup>\_\_\_\_ day of August 2021, at Carson, California.

6 Electronically Signed 2021-08-09 22:59:26 UTC - 73.162.105.232  
*Meagan Hernandez*  
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