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Attorneys for Plaintiffs and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

KEVIN BIHAN-POUDEC, TAYLOR
EDWARDS, individually, and on behalf of
other members of the general public similarly
situated and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiffs,

vs.

FARFETCH.COM US LLC, a California
limited liability company; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 19STCV00800

Honorable Daniel J. Buckley
Department SSC1

CLASS ACTION

**DECLARATION OF KEVIN BIHAN-
POUDEC IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement;
Declaration of Class Counsel (Edwin
Aiwarzian); Declaration of Class
Representative (Taylor Edwards);
Declaration of Settlement Administrator
(Zachary Cooley); and [Proposed] Final
Approval Order and Judgment filed
concurrently herein]

Date: April 6, 2022
Time: 10:30 a.m.
Department: SSC1

Complaint Filed: January 7, 2019
FAC Filed: February 14, 2019
SAC Filed: December 7, 2020
Trial Date: None Set

DECLARATION OF KEVIN BIHAN-POUDEC

I, **Kevin Bihan-Poudec**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case. 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 FarFetch.com US LLC ("FarFetch") in an hourly-paid, non-exempt position from approximately January 2015 to April 2017. I decided to seek legal advice about my work experiences with FarFetch and about pursuing my grievances. I contacted Lawyers for Justice, PC and spoke with attorneys there, including Edwin Aiwazian. I wanted to do whatever I could to make sure FarFetch was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated class action and representative lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 6 hours. Thereafter, I consulted with the attorneys at Lawyers for Justice, PC for 5 hours discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff, class representative, and eventually a representative under the California Private Attorneys General Act ("PAGA").

3. I have spent over 18 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with FarFetch, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from FarFetch. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. I was available to answer any questions my attorneys had and was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible, gave them all the information I had, and identified as many documents as I could. I

1 spent at least 16 additional hours speaking with my attorneys about the case, identifying potential
2 witnesses, providing my attorneys with documents and information concerning the case, and also
3 describing the policies, practices, and procedures of FarFetch.

4 5. As far as the settlement is concerned, I was available to review the settlement
5 documents and answer any questions my attorneys had. I spent about 3 hours reviewing the
6 settlement agreement and about 2 hours asking questions and discussing the potential settlement
7 with my attorneys before signing the settlement agreement.

8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to represent the class. I think my efforts helped to get the results
10 obtained in this case, and as a class representative, I respectfully request that the Court award me
11 a service award in the amount of \$7,500.00 for my active participation in this case. Taking into
12 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

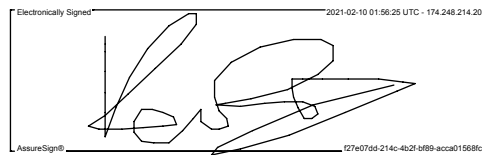
13 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

14 8. I have not entered into any undisclosed agreements, nor have I received any
15 undisclosed compensation in this case. The only compensation I will receive is whatever amount
16 the Court awards as a service award, as well as my share of the settlement fund as a class
17 member.

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

20 Executed on February 09, 2021, at Los Angeles, California.

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An electronic signature box containing a stylized signature. The box includes the text "Electronically Signed" at the top, a date and time stamp "2021-02-10 01:58:25 UTC - 174.248.214.205" at the top right, and a long alphanumeric hash "e27e07dd-214c-4b2f-bf89-acc0a01588c7" at the bottom right. The signature itself is written in black ink over a white background within the box.

Kevin Bihan-Poudec