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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

KRISTY MINOR, 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;

Plaintiff,

vs.

HSNI, LLC, an unknown business entity; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: CIVDS1910946

Honorable David Cohn
Department S26

CLASS ACTION

**DECLARATION OF KRISTY MINOR
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

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

Date: September 4, 2020
Time: 10:00 a.m.
Department: S26

Complaint Filed: April 10, 2019
FAC Filed: September 9, 2019
SAC Filed: June 23, 2020
Jury Trial: None Set

DECLARATION OF KRISTY MINOR

I, **Kristy Minor**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff 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 HSNI, LLC ("HSNI") in an hourly-paid, non-exempt position from approximately November 2016 to May 2017. I decided to seek legal advice about my work experiences with HSNI and about pursuing my grievances. I contacted Lawyers for Justice, PC and spoke with attorneys there, including Edwin Aiwanian. I wanted to do whatever I could to make sure HSNI 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 lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 8 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 and class representative.

3. I have spent over 15 hours meeting and communicating with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with HSNI, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance regarding the duties of other non-exempt employees at HSNI, and helping develop a strategy as to what documents and information to obtain from HSNI. 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 spent at least 13 additional hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also

describing the policies, practices, and procedures of HSNI.

5. On September 27, 2017, I attended a deposition that lasted approximately 3.5 hours. I spent at least 5 hours preparing for the deposition and approximately 3.5 additional hours traveling to and from the deposition. After the deposition, I spent at least 2 hours reviewing my testimony and discussing the contents of the deposition transcript with my attorneys.

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

7. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class. I think my efforts helped to get the results obtained in this case, and as a class representative, I respectfully request that the Court award me an service payment in the amount of \$10,000.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

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

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

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

Executed on June 04, 2020, at Riverside, California.

Electronically Signed 2020-06-05 17:24:22 UTC - 172.116.24.255

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Kristy Minor