

LARRY W. LEE, Bar No. 228175
lwlee@diversitylaw.com
KWANPORN "MAI" TULYATHAN, Bar No. 316704
ktulyathan@diversitylaw.com
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile

WILLIAM L. MARDER, Bar No. 170131
bill@polarislawgroup.com
Polaris Law Group
501 San Benito Street, Suite 200
Hollister, CA 95023
(831) 531-4214
(831) 634-0333 facsimile

Attorneys for Plaintiff James Sims,
the Class, and Aggrieved Employees

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

JAMES SIMS, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

QG PRINTING II LLC, a Connecticut
limited liability company; 74 QG
PRINTING II LLC, business
organization, form unknown; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 5:20-cv-01632-DMG-KK

**DECLARATION OF JAMES SIMS IN
SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF ATTORNEYS'
FEES, COSTS, AND CLASS
REPRESENTATIVE ENHANCEMENT
PAYMENT**

Date: April 19, 2024

Time: 10:00 A.M.

Courtroom: 8C

Judge: Hon. Dolly M. Gee

DECLARATION OF JAMES SIMS

I, James Sims, declare as follows:

1. I am the named Plaintiff in the above-entitled action. I have personal knowledge of the matters set forth herein, and if called upon as a witness to testify thereto, I could and would competently do so.

2. This declaration is submitted in support of Plaintiff's Motion for Final Approval of Class Action Settlement and for my class representative enhancement request for Ten Thousand Dollars (\$10,000.00).

3. I was employed by Defendant QG Printing II, LLC ("Defendant" or the "Company") as a Pressman Handler from about 2016 to about November 10, 2019. I worked as a non-exempt employee.

4. During my employment with Defendant, I was not paid wages for all hours worked. Specifically, I was required to call a designated telephone number and find out whether I was to report to my scheduled shift. I was not allowed to use the Company's telephone to make these calls and was required to use my own home phone and/or personal cell phone. On occasions when I reported to work and was not allowed to work or worked less than half of my scheduled shift, I did not receive reporting time pay. It is my belief that other Class Members were subjected to the same practices.

5. As a result of these Company practices, the wage statements I received did not identify accurate gross and net wages earned, and total hours worked. In addition, whenever I earned overtime and double time wages, the wage statements identified inaccurate hourly rates of pay for these wages. Finally, the wage statements also identified an incorrect legal name of the employer. It is my belief that the other Class Members received similar wage statements.

6. I have and continue to be willing to assist in the investigation of this matter as well as make myself available for trial or any further proceeding in this matter as required to represent the interests of the Class. I also understand my duties and

responsibilities to the proposed class and have carried out those duties as necessary.

7. Throughout the course of litigation, I met and conferred with Class Counsel on a number of occasions to discuss the case and the facts involved, including providing substantive information regarding Defendant's practices and procedures that I followed during my employment with Defendant.

8. I also reviewed documents and pleadings in this case, including my personnel file and employment records, the PAGA letter, complaint, and the Settlement Agreement, and signed declarations in support of motions that my attorneys were bringing on behalf of the class, such as Plaintiff's Motion for Class Certification, Motion for Preliminary Approval, the instant motion and Plaintiff's intended Motion for Final Approval.

9. I also met with my attorneys to prepare for my deposition, attended a full-day deposition, and reviewed the deposition transcript with my attorneys.

10. I regularly spoke with my attorneys to inquire about the status of the case. I also remained available to speak to my attorneys throughout two mediation sessions for this case.

11. In sum, I estimate that I have spent approximately 40 hours in connection with this case.

12. Although I believe the work and input that I put into the case was worth more than \$10,000 that is being requested, I agreed to accept that amount for the benefit of the Class.

13. To my knowledge, there are no conflicts which exist between my interest in this action and the interests of the Class Members that would impair my ability to serve as representative of the Class.

14. I have discussed the settlement and its impact in this case with my attorneys. Based on my understanding of the case, I am of the opinion that settlement for the consideration and on the terms set forth in the Settlement Agreement are fair, reasonable,

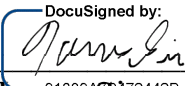
1 and adequate and is in the best interests of the Class.

2 15. I understood from the inception of this lawsuit that I could have possibly
3 faced paying the fees and costs of Defendant, had I not prevailed in this action because
4 the claims alleged by me involved the payment of fees and costs to the prevailing party.

5 16. I understood that filing this lawsuit is a public record and there was a
6 possibility that a class action would receive more attention than an individual action and
7 undertook such action.

8 17. I am proud of the result and accomplishment of this lawsuit. I feel that it is a
9 positive accomplishment and understand that other people will benefit because of the
10 actions that I have taken.

11 I declare under penalty of perjury and the laws of the United States of America and
12 the State of California that the foregoing is true and correct and that this declaration was
13 executed on March 1, 2024, at Golden Valley, Arizona.

14 DocuSigned by:
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