

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff and the Class

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

GREGORY SCHAEFER, 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.

DENSO PRODUCTS AND SERVICES
AMERICAS, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 19STCV00685

Honorable Elihu M. Berle
Department SSC6

CLASS ACTION

**DECLARATION OF GREGORY
SCHAEFER IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEYS' FEES,
COSTS, AND SERVICE AWARD**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Service Award;
Declaration of Class Counsel (Edwin
Aiwazian); Declaration of Settlement
Administrator (Atticus Administration, LLC);
and [Proposed] Final Approval Order and
Judgment filed concurrently herein]

Date: April 15, 2021
Time: 9:00 a.m.
Department: SSC6

Complaint Filed: January 10, 2019
FAC Filed: August 13, 2020
Trial Date: None Set

DECLARATION OF GREGORY SCHAEFER

I, **Gregory Schaefer**, 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 Denso Products and Services Americas, Inc. ("Denso") in an hourly-paid, non-exempt position from approximately July 2004 to October 2017. I decided to seek legal advice about my work experiences with Denso 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 Denso paid me and other employees what was owed to us 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 7 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 6 hours to discuss my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff, class representative, and eventually representative pursuant to the Private Attorneys General Act ("PAGA").

3. I have spent over 15 hours meeting with my attorneys and fulfilling my responsibilities as a class representative in this case, which included gathering documents concerning my employment with Denso, reviewing documents with my attorneys and answering their questions, providing guidance and information regarding the work performed by other non-exempt employees of Denso, and helping develop a strategy as to what documents and information to obtain from Denso. I frequently checked in with my attorneys and their staff to make sure that they had my most current information and any additional information that I had obtained.

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

documents as I could. I spent at least 12 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 policies, practices, and procedures of Denso.

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

6. 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 result obtained in this case, and as a class and PAGA representative, I respectfully request that the Court award me a service award in the amount of \$7,500.00 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.

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

8. 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 a service award, 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 August 17, 2020, at Hemet, California.

Electronically Signed 2020-08-17 18:03:22 UTC - 192.77.189.218

AssureSign 643130b2-edc8-4ba6-8136-ac1a0121dec3

Gregory Schaefer