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Attorneys for Plaintiffs, the Class, and Aggrieved Employees

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

ROBERT JORDAN and CHANRAKSMEY
KAM, as individuals and on behalf of all
others similarly situated,

Plaintiffs,

vs.

THE JUNE GROUP, LLC, a California
limited liability company; and DOES 1
through 50, inclusive,

Defendants.

Case No. 37-2020-00030141-CU-OE-CTL

[Assigned for all purposes to the Honorable Loren
G. Freestone, Dept. C-64]

**DECLARATION OF CHANRAKSMEY KAM
IN SUPPORT OF PLAINTIFFS' MOTION TO
APPROVE SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE ATTORNEYS
GENERAL ACT OF 2004**

Date: April 18, 2025

Time: 10:30 a.m.

Dept.: C-64

Action Filed: August 27, 2020

I, Chanraksmeey Kam, declare as follows:

1. I am an individual over the age of 18 years old and am a resident of California. I am a named Plaintiff in this matter. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I was employed by Defendant The June Group LLC (“Defendant”) until about April 9, 2020. Throughout my employment with Defendant, I worked as a non-exempt, hourly employee.

3. I understand that this action was brought on behalf of the State of California and other employees of Defendant. I have invested a lot of personal time and energy into representing the interests of my co-workers and the State.

4. Throughout the case, I spent time looking for documents relevant to the case, including wage statements, policies, and emails. Additionally, I met with my attorneys on multiple occasions to provide documents and information regarding Defendant’s pay plans and orientation and testing policies. I also met with my attorneys to discuss the status of the lawsuit and provide input on case documents, such as the PAGA Notice and complaints.

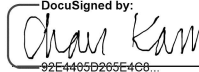
5. Before signing the PAGA Settlement Agreement (the “Settlement Agreement” or “Agreement”), I discussed in detail the terms of the Agreement with my attorneys. I believe that the terms of the Agreement are fair, adequate and reasonable.

6. I did not make the decision to join this representative action lightly. I was concerned by the attention a publicly filed lawsuit would attract. My name would be associated with a lawsuit that I filed against my employer. Additionally, because the claims alleged by me involved the payment of costs to the prevailing party, I could have possibly faced paying the fees and costs of Defendant, had I not prevailed in this action. I also understood that an individual case would have been resolved much faster than a representative action and involved much less financial risk.

7. I respectfully request that the Court award me a \$2,500.00 Service Award. I believe this amount is fair compensation for my time and effort in this case, for helping to prosecute this case, and the risks with respect to my current and future employment.

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

3 Executed on this ²⁴ day of March 2025, at San Diego, California.

4 DocuSigned by:

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