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**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 ROBERT JORDAN IN
SUPPORT OF PLAINTIFFS' MOTION TO
APPROVE SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE ATTORNEYS
GENERAL ACT**

Date: April 18, 2025

Time: 10:30 a.m.

Dept.: C-64

Action Filed: August 27, 2020

I, Robert Jordan, 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 was a non-exempt, hourly employee.

3. Throughout my employment with Defendant, I was required to attend mandatory orientations and underwent post-employment drug testing. However, I was not paid wages for time spent attending the orientations and/or undergoing said drug testing.

4. I understand that this action was brought on a representative basis on behalf of the State of California and other aggrieved employees of Defendant. I do not have any interests that are adverse to the other employees that are part of the PAGA settlement.

5. I have spent a significant amount of time discussing this matter with my attorneys on many occasions and explaining my understanding of Defendant’s practices. To date, I have performed a number of tasks in my role as the representative. This includes discussing the case and facts involved with my attorneys; searching for and providing documents pertaining to the case; reviewing the documents, files, and pleadings, including my employment records and pay stubs, the PAGA Notice, complaints, arbitration demand, and PAGA Settlement Agreement (the “Settlement Agreement” or “Agreement”); and regularly providing information to my attorneys.

6. Before signing the Settlement 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.

7. 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 Defendant’s fees and costs, 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.

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

9. I respectfully request that the Court award me a Service Award of \$2,500.00. 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.

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

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

Signed by:

 AA24B94FC291488
 Robert Jordan