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Attorneys for Plaintiffs and the Class

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

CINDY ARAICA, individually, and on
behalf of other members of the general
public similarly situated; KEVIN
ESTRADA, 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;

Plaintiffs,

vs.

DIGITAL ROOM INC., a California
corporation; DIGITAL ROOM LLC, a
California limited liability company; AMC
ACQUISITION LLC, an unknown business
entity; and DOES 2 through 100, inclusive,

Defendants.

Case No.: BC680445

Honorable William Highberger
Department SSC10

CLASS ACTION

**DECLARATION OF CINDY ARAICA IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES, COSTS, AND SERVICE AWARDS**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Service Awards;
Declaration of Class Counsel (Edwin
Aiwaizian); Declaration of Class
Representative (Kevin Estrada); Declaration of
Settlement Administrator (Kevin Lee); and
[Proposed] Final Approval Order and
Judgment filed concurrently herein]

Date: March 9, 2021
Time: 11:00 a.m.
Department: SSC10

Complaint Filed: October 19, 2017
FAC Filed: January 10, 2020
SAC Filed: November 3, 2020
Trial Date: None Set

DECLARATION OF CINDY ARAICA

I, **Cindy Araica**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs 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 Defendants Digital Room, LLC, Digital Room, Inc. and AMC Acquisition, LLC Inc. ("Digital Room") in an hourly-paid, non-exempt position from approximately January 2015 to April 2015. I decided to seek legal advice about my work experiences with Digital Room and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there, including Edwin Aiwarzian. I wanted to do whatever I could to make sure Digital Room 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 6 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 4 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 communicating and corresponding with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with Digital Room, reviewing documents with my attorneys and answering their questions, providing and information guidance regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Digital Room. 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

1 spent at least 12 additional hours speaking with my attorneys about the case, identifying potential
2 witnesses, providing my attorneys with documents and information concerning the case, and also
3 describing the policies, practices, and procedures of Digital Room.

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

8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to represent the class. I think my efforts helped to get the results
10 obtained in this case, and as a class representative, I respectfully request that the Court award me
11 a service award in the amount of \$7,500.00 for my active participation in this case. Taking into
12 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

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

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

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

20 Executed on September 29, 2020, at Compton, California.

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An electronic signature of Cindy Araica, consisting of a stylized cursive 'Cindy' followed by a large, sweeping 'A'. The signature is contained within a rectangular box that also displays technical metadata at the top and bottom.

Cindy Araica