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Attorneys for Plaintiffs

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;

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 F. Highberger
Department 10

CLASS ACTION

**DECLARATION OF KEVIN ESTRADA
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Edwin Aiwazian); Declaration of
Proposed Class Representative (Cindy
Araica); and [Proposed] Order filed
concurrently herewith.]

Date: November 3, 2020
Time: 3:00 p.m.
Department: 10

Complaint Filed: October 19, 2017
FAC Filed: January 10, 2020
Jury Trial: None Set

DECLARATION OF KEVIN ESTRADA

I, **Kevin Estrada**, 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 June 2017 to January 2018. 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. 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 8 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 5 hours discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff, class representative, and eventually a representative under the Private Attorneys General Act ("PAGA").

3. I have spent over 12 hours communicating 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, answering questions and providing guidance regarding the duties of other 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 spent at least 10 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 the policies, practices, and procedures of Digital Room.

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

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 results obtained in this case, and as a class 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 October 06, 2020, at Los Angeles, California.

Electronically Signed
2020-10-06 17:46:58 UTC - 172.58.23.196

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Kevin Estrada