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Attorneys for Plaintiffs

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

ALBERT EBUEN, individually, and on behalf
of other members of the general public
similarly situated;

Plaintiff,

vs.

RED RIBBON BAKESHOP INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: BC715064

Honorable Kenneth R. Freeman
Department SSC14

CLASS ACTION

**DECLARATION OF ALBERT EBUEN
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 (Maricel J.
Santa Ana); and [Proposed] Order filed
concurrently herewith.]

Date: January 26, 2021
Time: 10:00 a.m.
Department: SSC14

Complaint Filed: July 26, 2018
Trial Date: None Set

DECLARATION OF ALBERT EBUEN

I, **Albert Ebuén**, 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 Red Ribbon Bakeshop Inc. ("Red Ribbon") in an hourly-paid, non-exempt position from approximately March 2011 to November 2015. I decided to seek legal advice about my work experiences with Red Ribbon 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 Red Ribbon 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 6 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 5 hours to discuss 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 22 hours meeting with my attorneys and fulfilling my responsibilities as a class representative in this case, which included gathering documents concerning my employment with Red Ribbon, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance regarding the work performed by other non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Red Ribbon. 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 15 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 Red Ribbon.

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 3 hours 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 representative, I respectfully request that the Court award me an enhancement payment in the amount of \$10,000.00 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 an enhancement payment, 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 September 28, 2020, at Las Vegas, Nevada.

An electronic signature box containing a stylized signature. The box has a header "Electronically Signed" and a timestamp "2020-09-28 22:39:41 UTC - 98.160.162.230". The bottom left corner of the box is labeled "AssureSign®" and the bottom right corner contains a long alphanumeric string "530720f-19d1-477b-a4d2-ac400178543".

Albert Ebu