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Attorneys for Plaintiff Diego Degante

**SUPERIOR COURT OF STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

DIEGO DEGANTE, individually, and on
behalf of all other similarly situated
employees,

Plaintiffs,

vs.

SUN LEE, INC., a California corporation, and
DOES 1 through 50, inclusive,

Defendant.

) Case No.: 20STCV31759
) Related Case: 21STCV07574

) Assigned for all purposes to the Hon.
) Lawrence P. Riff, Dept. 7

) **DECLARATION OF PLAINTIFF DIEGO
) DEGANTE IN SUPPORT OF MOTION
) FOR FINAL APPROVAL OF CLASS
) ACTION SETTLEMENT**

) Action Filed: August 18, 2020
) FAC Filed: November 20, 2020
) Trial Date: None

) **Hearing Date:** October 26, 2022
) **Time:** 10:00 am
) **Dept.:** 7

1 I, Diego Degante, declare as follows:

2 1. I currently reside in Los Angeles, California. I am over the age of eighteen and have
3 personal knowledge of everything stated below and could competently testify to these facts if
4 sworn.

5 2. I submit this Declaration in support of the motion for final approval of class action
6 settlement and class representative enhancement fee.

7 3. I worked for Defendant Sun Lee, Inc (collectively referred to herein as “Defendants”). As
8 I worked for Defendants as an hourly worker. While working for Defendants I worked very hard
9 and felt that I was not being treated like a valued worker, especially when I worked above five
10 and ten hours. After my employment ended with Defendants, I determined that I would attempt
11 to effectuate a change in Defendants practices and policies through a class action and
12 representative action under the Private Attorney General Act. After consulting with a law firm, I
13 decided to file a class action claim against Defendants I would consider myself a low wage
14 hourly worker but despite this I still decided to take the risk of filing this class action and losing
15 this case that could have exposed myself and my family to certain attorneys’ fees and costs
16 incurred by Defendants. However, my passion to vindicate the rights of my coworkers
17 outweighed the risk exposure to myself and my family as I believed that my co-workers deserved
18 to be treated fairly in the eyes of the law.

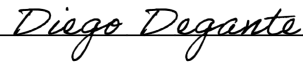
19 4. Throughout this case, I was required to appear make myself available several times,
20 answering questions during several interviews by my attorney and their staff either related to the
21 case, and locating and submitting documents to my attorney in support of the claims.

22 5. On August 16, 2021, I participated in a full-day mediation. This mediation lasted from
23 approximately 9:30 a.m. to after 6:00 p.m. During the mediation, I remained involved and
24 provided information and details about Defendant’s practices and policies in support of the class
25 claims so that the claims could be maximized for the class members. After the August 16, 2021
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1 mediation, I also made myself available to complete the settlement agreement and finalize the
2 terms of the settlement agreement and execute the settlement agreement.

3 6. In this litigation, I was committed throughout the entire process to ensure that the class
4 members were treated fairly. I would estimate that I devoted approximately 75 hours to the
5 prosecution and resolution of these claims.
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7 I declare under the penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct. Executed on July 11, 2022 in Irvine, California.
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12 Diego Degante, Declarant
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