

Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Yasmin Hosseini (SBN 326399)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs

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

IMAHNI ISIS CUNNINGHAM, and
NINETTE AMAYA, individually, and on
behalf of other members of the general
public similarly situated;

Plaintiffs,

vs.

SERVICON SYSTEMS, INC., an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 20STCV35595

Honorable Carolyn B. Kuhl
Department 12

CLASS ACTION

**DECLARATION OF IMAHNI ISIS
CUNNINGHAM 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 (Yasmin Hosseini and Raul Perez);
Declaration of Proposed Class
Representative (Ninette Amaya and
Christopher Bell); and [Proposed] Order
filed concurrently herewith]

Date: April 17, 2024
Time: 10:00 a.m.
Department: 12

Complaint Filed: September 17, 2020
FAC Filed: October 10, 2022
Trial Date: None Set

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1 them as quickly as possible and gave them as much information and identified as many
2 documents as I could. I spent at least 10 additional hours speaking with my attorneys about the
3 case, identifying potential witnesses, providing my attorneys with documents and information
4 concerning the case, and also describing policies, practices, and procedures of Defendant.
5 During the discovery phase of the litigation, I spent approximately 10 additional hours reviewing
6 Defendant's discovery requests, locating documents, and providing documents, and responses to
7 my attorneys.

8 5. As far as the settlement is concerned, I was available to review documents and
9 answer any questions my attorneys had. I spent about 4 hours reviewing the settlement
10 agreement and about 5 hours asking questions and discussing the potential settlement with my
11 attorneys before signing the settlement agreement.

12 6. I believe that I have done everything that my attorneys have asked of me and have
13 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
14 and the State of California. I think my efforts helped to get the result obtained in this case, and as
15 a class and PAGA representative, I respectfully request that the Court award me a class
16 representative service payment in the amount of \$10,000.00 for my active participation in this
17 case. Taking into consideration the time that I have dedicated to the cases, I believe that this
18 amount is reasonable.

19 7. I am not related to anyone associated with Lawyers *for* Justice, PC or Capstone
20 Law APC.

21 8. I have not entered into any undisclosed agreements, nor have I received any
22 undisclosed compensation in this case. The only compensation I will receive is whatever amount
23 the Court awards as a class representative service payment as well as my share of the settlement
24 as a class member.

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

27 ///

28 ///

02/09/2024

Executed this ____ day of February 2024, at Hawthorne, California.

Electronically Signed
Imahni Isis Cunningham
Nintex AssureSign®
2024-02-09 23:58:14 UTC - 172.56.209.176
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Imahni Isis Cunningham