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Attorneys for Plaintiffs Imahni Isis Cunningham and Ninette Amaya and the Class

**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 SSC-12

CLASS ACTION

**DECLARATION OF NINETTE AMAYA
IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT CLASS
COUNSEL FEES PAYMENT, CLASS
COUNSEL LITIGATION EXPENSES,
CLASS REPRESENTATIVE SERVICE
PAYMENTS, AND PAGA
REPRESENTATIVE PAYMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Class Counsel
(Yasmin Hosseini and Raul Perez);
Declaration of Class Representatives (Imahni
Isis Cunningham and Christopher Bell); and
[Proposed] Order filed concurrently
herewith]

Date: November 13, 2024
Time: 10:30 a.m.
Department: SSC-12

Complaint Filed: September 17, 2020
FAC Filed: October 12, 2022
SAC Filed: March 27, 2024
Trial Date: None Set

DECLARATION OF NINETTE AMAYA

I, Ninette Amaya, 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 Servicon Systems, Inc. ("Defendant") as an hourly-paid position from approximately August 2020 to approximately September 2021. I decided to seek legal advice about my work experiences with Defendant 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 Defendant paid me and other employees what was owed to us and was held accountable for their practice of not properly compensating its employees 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 8 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 9 hours discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff and class and PAGA representative.

3. I have spent over 16 hours meeting with my attorneys regarding the cases and fulfilling my responsibilities as a named plaintiff and class and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of hourly and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. 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. Since becoming involved in this matter, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me.

1 I responded to them as quickly as possible and gave them as much information and identified as
2 many documents as I could. I spent at least 12 additional hours speaking with my attorneys
3 about the case, identifying potential witnesses, providing my attorneys with documents and
4 information concerning the cases, and also describing policies, practices, and procedures of
5 Defendant.

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

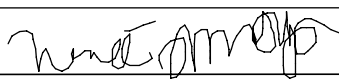
10 6. I believe that I have done everything that my attorneys have asked of me and have
11 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
12 and the State of California. I think my efforts helped to get the result obtained in this case, and as
13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

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

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

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

25 Executed this ^{Ninette Ar} ____ day of February 2024, at North Hollywood, California.

26 Electronically Signed  2024-02-13 07:16:11 UTC - 45.49.90.201
Ninette AssumeSign® d72d8630-ae27-48e6-9012-b115001155d6

27 Ninette Amaya