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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 IMAHNI ISIS
CUNNINGHAM IN SUPPORT OF
PLAINTIFF'S NOTICE OF MOTION
AND 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 Final
Approval of Class Action Settlement;
Declaration of Class Counsel (Yasmin
Hosseini and Raul Perez); Declaration of
Class Representatives (Ninette Amaya 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

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I, **Imahni Isis Cunningham**, 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 2019 to approximately April 2020. 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 7 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 8 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 14 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. As the case progressed, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to

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.

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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