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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 CHRISTOPHER BELL
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

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

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

DECLARATION OF CHRISTOPHER BELL

I, Christopher Bell, hereby declare as follows:

1. I am over eighteen years old and unless the context indicates otherwise, I have personal knowledge of the following facts, and if called as a witness, I could and would testify competently to them. I am a named plaintiff in the above-captioned action, and a proposed representative for the settlement class. I make this declaration in support of the Motion for Preliminary Approval of Class Action Settlement.

2. I was employed by Defendant Servicon Systems, Inc. (“Defendant”) in California an hourly paid, non-exempt Security Escort from approximately October 2018 to May 2020. My job duties included signing in visitors to the premises, escorting authorized visitors to the worksite, monitoring the visitors while they worked at the jobsite, and escorting the visitors off of the premises.

3. I decided to file my lawsuit—*Christopher Bell v. Servicon Systems, Inc.*, filed on January 26, 2021 in Kern County Superior Court as Case No. BCV-21-100173 and transferred to Los Angeles County Superior Court as Case No. 23STCV27083—because I had a number of grievances against Defendant stemming from its labor policies. These grievances are set forth in detail in my Complaint and my letter to California Labor and Workforce Development Agency (“LWDA”).

4. Prior to filing my action, my attorneys and I had multiple conferences about the factual bases for the claims that I wanted to pursue against Defendant.¹ During those conferences, my attorneys provided me with an overview of how those claims would be litigated, and generally educated me about the nature of complex/representative litigation and my role as the representative Plaintiff.

5. After retaining my attorneys, I spent considerable time on the phone discussing the facts of my case with my attorneys. I discussed the facts related to my employment with Defendant, including discussing my job duties and responsibilities, my job position, the hours and days I worked, and how I was compensated.

6. My attorneys provided me with a draft of the Complaint for my review and approval. I

¹ Although the preservation of my attorney-client privilege requires that I refrain from revealing the specifics of my communications with my attorneys, I understand that the privilege is not waived by stating generally the matters that I have discussed with my attorneys.

1 closely reviewed the Complaint to ensure accuracy and completeness. Following the filing of the
2 Complaint, I collaborated with my attorneys on the prosecution of my claims, and I regularly contacted
3 my attorneys to stay current on the status of the litigation, and to discuss my attorneys' progress in
4 prosecuting the claims.

5 7. I have worked to the best of my ability to prosecute this action on behalf of the entire
6 class, always considering the interests of the class members just as I would consider my own interests. I
7 believe class actions are an important tool to assure compliance with the law even where an individual's
8 losses may be relatively small. I have no interests which are inconsistent with the interests of the class.

9 8. When I agreed to represent other non-exempt employees performing duties for
10 Defendant in the State of California, I understood it was my duty to be readily available and to participate
11 actively in this case. I knew that I would be required to review documents, search for documents and
12 produce them to my attorneys, answer written questions, potentially answer oral questions and testify
13 truthfully under oath, and be available to appear in court, if necessary.

14 9. I understood that I needed to maintain awareness of the status and progress of the
15 lawsuit.

16 10. Since initiating this lawsuit until now, I have kept aware of the status of the lawsuit and
17 provided my attorneys with information used by them in the litigation. I have spent large amounts of
18 time and effort pursuing my claims and the claims of the other employees from the time I retained my
19 attorneys to the present date.

20 11. I worked closely with my attorneys during the discovery phase of the litigation, and in
21 particular, I spent considerable time working with my attorneys to prepare responses to Defendant's
22 discovery requests, including form interrogatories (general and employment) and document requests.

23 12. I have carefully reviewed the terms of the proposed settlement. My attorneys explained
24 the specifics of how the settlement would work and I accepted the settlement only after I had spent time
25 evaluating the proposed outcome to assure that it was fair. Based on my attorneys' evaluation and
26 recommendation, and my own review, I believe the settlement is fair and reasonable and adequately
27 compensates Class Members.

28 13. In summary, over the course of this litigation I have spent a significant amount of time

1 conferring and working with my attorneys on the prosecution of my claims and evaluating the settlement
2 and related documents. I estimate that I have spent between 30 and 40 hours assisting my attorneys in the
3 prosecution of this lawsuit.

4 14. Throughout this case, I have not sought individual benefits from the lawsuit. Rather, I
5 maintained this lawsuit because I wanted to hold Defendant accountable for its unlawful conduct. I
6 believe that I have fulfilled my responsibilities, and I will continue to fulfill those responsibilities, to the
7 best of my ability, until the conclusion of the case.

8 15. I am committed to this case and will continue to make myself available as needed in the
9 settlement process.

10 16. I have given prior written consent of the following division of attorneys' fees between
11 Capstone Law APC and Lawyers for Justice, PC: 30% to Capstone Law APC and 70% to Lawyers for
12 Justice, PC.

13 I declare under penalty of perjury under the laws of the State of California that the foregoing is
14 true and correct. Executed on [Date] 2/12/2024, at [City] Temple, Texas.

DocuSigned by:

Christopher Bell

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Christopher Bell