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Attorneys for Plaintiff and the proposed class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF KERN**

DANIEL STEPHENSON, an individual, on
 behalf of himself and others similarly situated

PLAINTIFF,

v.

BAKERSFIELD DODGE, INC.; and DOES 1
 thru 50, inclusive,

DEFENDANTS.

CASE NO. BCV-20-102693

[Case Assigned for All Purposes to Hon.
 Thomas S. Clark in Dept. 17]

**DECLARATION OF DANIEL
 STEPHENSON IN SUPPORT OF FINAL
 APPROVAL OF CLASS SETTLEMENT**

Date: May 26, 2023

Time: 8:30 AM

Dept.: 17

Complaint Filed: November 18, 2020

FAC Filed: February 18, 2021

Trial Date: None Set

DECLARATION OF DANIEL STEPHENSON

I, DANIEL STEPHENSON, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant BAKERSFIELD DODGE, INC. (“Defendant”) as an hourly employee.

3. I brought this lawsuit, on behalf of myself and all other Class Members, against Bakersfield Dodge, Inc. I understand that I am representing other employees and I believe that I am able to represent them well.

4. I first researched experienced attorneys who are very experienced with these types of lawsuits. Once retained, I compiled relevant documents from my employment to assist my attorneys in litigating this case. I worked with my attorneys to develop the facts and legal claims in this lawsuit. The lawsuit was filed in November 2020.

5. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the Settlement as needed. Additional work in connection with this matter includes providing information to my attorneys regarding my employment with Defendant, staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my attorneys’ various communications regarding this matter; and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of the Class Members.

6. I estimate the total time spent in connection with this matter is approximately 25-35 hours.

7. I have worked to actively represent the other Class Members and their interests.

8. I have always kept the Class Members interests at heart in this litigation.

9. I am prepared to continue assisting with this litigation and am committed to achieving the best possible results for the Class Members.

1 10. I believe that the class action settlement obtained on behalf of the Class Members
2 is fair and reasonable in light of the issues involved in this case. As mentioned above, I reviewed
3 and discussed the Settlement Agreement with my attorneys and asked them questions about it to
4 ensure that I understood its terms and what it would mean for all of the class members.

5 11. I believe that I have fairly represented the absent Class Members and request that
6 the Court finally approve this settlement and confirm me as Class Representative.

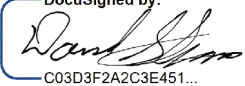
7 12. I am not aware of any conflicts of interest that prevent me from being confirmed as
8 Class Representative in this Lawsuit. I am not related in any way to my attorneys or to any other
9 member of the firm that is representing me. I have no business dealings or other involvement
10 beyond this lawsuit and this representation. I have not been promised any money or inducement
11 to serve as Class Representative in this Lawsuit.

12 13. It is my opinion that the settlement agreement provides for a fair and adequate
13 enhancement for me as a Class Representative, in the amount of \$5,000.00. I believe that this is
14 fair and reasonable in light of all of the work that I have performed in my role as Class
15 Representative. As Class Representative, I have actively participated in all stages of the litigation,
16 as detailed above, and have always maintained the best interests of the Class Members while
17 performing my Class Representative duties.

18 14. It is also my opinion that the Class Representative enhancement is fair, reasonable,
19 and adequate because of the many hours I spent participating in the prosecution of this case.
20 Likewise, I risk the potential stigma of being a Class Representative in a class action labor dispute,
21 which may affect my future employability.

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

24 Executed this 27 day of April, 2023 at Bakersfield, California.

25
26 DocuSigned by:

27 C03D3F2A2C3E451...
28 DANIEL STEPHENSON

(PROOF OF SERVICE)**[CCP 1013(a)(3)]****STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On May 4, 2023, I served all interested parties in this action the following documents described as: **DECLARATION OF DANIEL STEPHENSON IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

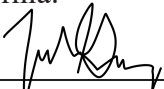
Daniel K. Klingenberger dklingenberger@lebeauthelen.com LeBeau Thelen LLP 5001 E. Commercenter Drive, Suite 300 P.O. Box 12092 Bakersfield, CA 93389-2092	Emil Davtyan emil@davtyanlaw.com Davtyan Law Firm, Inc. 400 N. Brand Blvd, Suite 700 Glendale, CA 91203
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[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] BY ELECTRONIC MAIL TRANSMISSION: I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 4, 2023, at Los Angeles, California.



Taylor Gregg