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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

EDUARDO LEE, individually, and on behalf
of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act

Plaintiff,

v.

DEL MONACO FOODS, INC., an unknown
business entity; DEL MONACO SPECIALTY
FOODS, INC., an unknown business entity;
and DOES 1 through 100, inclusive,

Defendants.

Case No.: 19CV347471

Honorable Sunil R. Kulkarni
Department 1

CLASS ACTION

**DECLARATION OF EDUARDO LEE IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement;
Declaration of Class Counsel (Edwin
Aiwasian); and [Proposed] Final Approval
Order and Judgment filed concurrently
herewith]

Date: September 29, 2022
Time: 1:30 p.m.
Department: 1

Complaint Filed: May 3, 2019
FAC Filed: November 12, 2019
SAC Filed: March 1, 2021
Trial Date: None Set

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1 and available to speak and meet with my attorneys whenever they needed me. I responded to
2 them as quickly as possible and gave them as much information and identified as many
3 documents as I could. I spent at least 16 additional hours speaking with my attorneys about the
4 case, identifying potential witnesses, providing my attorneys with documents and information
5 concerning the case, and also describing policies, practices, and procedures of Del Monaco
6 Foods.

7 5. As far as the settlement is concerned, I was available to review documents and
8 answer any questions my attorneys had. I spent about 3 hours reviewing the settlement
9 agreement and about 2 hours asking questions and discussing the potential settlement with my
10 attorneys before signing the settlement agreement.

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

17 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

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

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

24 11/15/2021

Executed this ____ day of November 2021, at Gilroy, California.

25 Electronically Signed 2021-11-15 17:38:28 UTC - 172.58.38.160
Lee Edwardo
AssureSign® e119108d-7ad7-4022-94d5-adde0170b034

26 Edwardo Lee