

DECLARATION OF RICHARD S. ZUNIGA

I, Richard S. Zuniga, declare:

1. I am an attorney admitted to practice before the courts of the State of California. I am an attorney in the law firm of Hill, Farrer & Burrill, LLP, counsel of record for Defendant J.J. Kane Associates, Inc. I submit this declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. Except for the Action designated as Elizabeth Moreno v. J. J. Kane Associates, Inc., Riverside County Superior Court Case No. CVRI2101236 ("Moreno Action"), I am not aware of any class, representative or other collective action in any other court in this or any other jurisdiction in California, in which a plaintiff has asserted claims to those asserted by Plaintiff in the Moreno Action. I have made a reasonable inquiry of J.J. Kane Associates, Inc., and of other members of my law firm, and none of them are aware of any similar actions against J.J. Kane Associates, Inc. other than the Moreno Action. I have also conducted a search of the website of the State of California, Department of Industrial Relations, and have not found any similar representative action filed against J.J. Kane Associates, Inc. other than the PAGA claim filed with the California Labor Workforce Development Agency by Plaintiff. Additionally, I also caused to be conducted a litigation search on Lexis, which search did not uncover any class, representative or other collective action against J.J. Kane Associates, Inc. other than the Moreno Action.

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

Executed January 6, 2022, at Los Angeles, California.


Richard S. Zuniga