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Attorneys for Plaintiffs and the Proposed Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA**FOR THE COUNTY OF SAN MATEO**

DAMONT RICHARDSON, an individual, and
 RAOOF ABDUL SAYAD, an individual, on
 behalf of themselves and others similarly
 situated,

PLAINTIFFS,

v.

PEGASUS AVIATION SERVICES, LLC; and
 DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. 21-CIV-00292

[Case Assigned for All Purposes to Hon.
 Danny Y. Chou in Dept. 22]

**DECLARATION OF RAOOF ABDUL
 SAYAD IN SUPPORT OF FINAL
 APPROVAL OF CLASS SETTLEMENT**

Date: September 29, 2022

Time: 9:00 a.m.

Dept.: 22

Complaint Filed: January 21, 2021

FAC Filed: March 29, 2021

Trial Date: None Set

DECLARATION OF RAOOF ABDUL SAYAD

I, Raoof Abdul Sayad, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and one of the named Plaintiffs 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 Pegasus Aviation Services, LLC ("Pegasus" or "Defendant"). I performed work for Pegasus as a non-exempt hourly employee for Pegasus from approximately June 2018 to April 2021. During my employment with Pegasus, I earned about \$35.00 per hour and also earned bonus pay.

3. I brought this lawsuit, on behalf of myself and all other Settlement Class Members, against Defendant because I believe that Pegasus did not properly pay all sick pay, provide proper rest breaks, and issue accurate itemized wage statements to me and other employees, among other violations.

4. I understand that I am representing other employees and I believe that I am able to represent them well.

5. I first researched experienced attorneys who are very experienced with these types of lawsuits. After retaining the firm of Mayall Hurley P.C., 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.

6. 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 Settlement Class Members.

7. I estimate the total time that I spent working with my attorneys for the purposes of prosecuting the class action claims is in excess of five hours.

1 8. I have worked to actively represent the other Settlement Class Members and their
2 interests.

3 9. I have always kept the Settlement Class Members interests at heart in this litigation.

4 10. I am prepared to continue assisting with this litigation and am committed to
5 achieving the best possible results for the Settlement Class.

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

10 12. I believe that I have fairly represented the absent Settlement Class and request that
11 the Court finally approve this settlement and confirm me as a Named Plaintiff.

12 13. I am not aware of any conflicts of interest that prevent me from being confirmed as
13 Named Plaintiff in this Lawsuit. I am not related in any way to my attorneys or to any other
14 member of the firm that is representing me. I have no business dealings or other involvement
15 beyond this lawsuit and this representation. I have not been promised any money or inducement
16 to serve as Named Plaintiff in this Lawsuit.

17 14. It is my opinion that the settlement agreement provides for a fair and adequate
18 enhancement for me as a Named Plaintiff, in the amount of \$3,000.00. I believe that this is fair
19 and reasonable in light of all of the work that I have performed in my role as Named Plaintiff. As
20 Named Plaintiff, I have actively participated in all stages of the litigation, as detailed above, and
21 have always maintained the best interests of the Settlement Class while performing my Named
22 Plaintiff duties.

23 15. It is also my opinion that the Named Plaintiff enhancement is fair, reasonable, and
24 adequate because, in addition to the many hours spent participating in the prosecution of this case,
25 I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we were
26 unsuccessful in this Lawsuit. Likewise, I risk the potential stigma of being a Named Plaintiff in a
27 class action labor dispute, which may affect my future employability.

28 I declare under penalty of perjury under the laws of the State of California that the foregoing

1 is true and correct.

2 Executed on 8/29/2022 in Stockton, California.

3 DocuSigned by:

4 Raof Abdul Sayad

5 Raof Abdul Sayad

(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 August 31, 2022, I served all interested parties in this action the following documents described as: **DECLARATION OF RAOOF ABDUL SAYAD IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

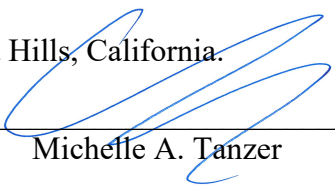
Heather Hearne hdh@kullmanlaw.com The Kullman Firm, PLC 4605 Bluebonnet Blvd., Suite A Baton Rouge, LA 70809	Emil Davtyan emil@davtyanlaw.com Davtyan Law Firm, Inc. 880 E. Broadway Glendale, CA 91205 John P. Briscoe jbriscoe@mayalllaw.com Mayall Hurley P.C. 2453 Grand Canal Boulevard Stockton, California 95207-8253
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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 above 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 August 31, 2022, at Woodland Hills, California.



Michelle A. Tanzer