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Attorneys for Plaintiff Celina Acuna

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

CELINA ACUNA, 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; IAN PFEIFLE, individually, and on behalf of other members of the general public similarly situated;

Plaintiffs,

vs.

BASS PRO OUTDOOR WORLD, LLC, an unknown business entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: CIVDS1811384

Honorable David S. Cohn
Department S26

**DECLARATION OF IAN PFEIFLE IN
SUPPORT OF PLAINTIFFS' 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 Aiwazian); Declaration of Class Representative (Celina Acuna); and [Proposed] Order filed concurrently herewith]

Date: April 26, 2022
Time: 10:00 a.m.
Department: S26

Complaint Filed: May 9, 2018
FAC Filed: June 3, 2021
Trial Date: None Set

DECLARATION OF IAN PFEIFLE

I, **Ian Pfeifle**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I have been employed by Bass Pro Outdoor World, LLC ("Bass Pro") as an hourly-paid, non-exempt employee from approximately January 29, 2019, to about July 10, 2021. I decided to seek legal advice about my work experiences with Bass Pro and about pursuing my grievances. I contacted Melmed Law Group, P.C and spoke with attorneys there. I wanted to do whatever I could to make sure Bass Pro was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 5 hours. Thereafter, I consulted with the attorneys at Melmed Law Group, P.C. for 10 hours discussing my situation, complex wage-and-hour class actions in general, and what it meant to join in the lawsuit as a named plaintiff and class representative.

3. Since becoming involved in this matter, I have spent over 17 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with Bass Pro, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance regarding the duties of hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Bass Pro. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. Throughout the case, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many

documents as I could. I spent at least 15 additional hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Bass Pro. This included discussing the impact of a prior-filed case on my claims and case.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about 3.5 hours reviewing the settlement agreement and asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class. I think my efforts helped to get the result obtained in this case, and as a class representative. I respectfully request that the Court award me an incentive payment in the amount of \$10,000.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

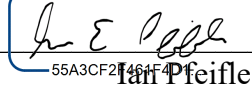
7. I am not related to anyone associated with Melmed Law Group, P.C. or Lawyers for Justice, PC.

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an incentive payment, as well as my share of the settlement fund as a class member.

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

Executed this 21 day of October 2021 at Manteca, California.

DocuSigned by:


 55A3CF21461F4D

Ian Pfeifle