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Attorneys for Plaintiff KEVIN MURPHY

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

KEVIN MURPHY, individually and
on behalf of all other Aggrieved
Employees,

Plaintiff,

vs.

FUSION LEARNING, INC., a
Delaware Corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No. 2:21-cv-06732-JAK-AS

Related Case No.: 2:22-cv-04497-JAK-AS

**DECLARATION OF CATHY
GONZALEZ IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: December 11, 2023

Time: 8:30 a.m.

Place: First Street Courthouse,
350 W. First Street
Courtroom 10B
Los Angeles, CA 90012

Complaint Filed: July 8, 2021

Trial Date: None Set

District Judge: Hon. John A. Kronstadt

Magistrate Judge: Hon. Alka Sagar

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I, CATHY GONZALEZ, declare:

1. I am an attorney licensed to practice before all of the courts of the State of California. I am one of the attorneys of record in the instant litigation, and I make this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement. I am familiar with the files, pleadings, and facts in this case and could and would competently testify to the following on the basis of my own personal knowledge.

2. I have been practicing law since August of 2016. I am a 2015 graduate of Loyola Law School. I received my bachelor's degree from University of California Berkeley in 2006. After my admission to the bar, I litigated civil matters including individual employment actions, wrongful termination and retaliation matters, corporate derivative suits, breach of contract and fraud cases, and other general civil actions. I successfully litigated several cases through trial.

3. I joined Haig B. Kazandjian Lawyers, APC in January of 2019 and have mainly worked on complex cases involving labor and employment, as well as mass tort claims over the last four years. I have litigated numerous off-the-clock, unpaid overtime, meal break, rest break, misclassification, and piece-rate cases.

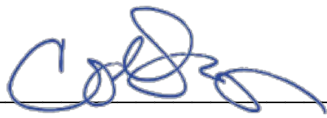
4. Since joining HBK Lawyers, I have been closely involved in a significant number of wage and hour class and representative matters from inception through final approval. The following wage-and-hour class action and PAGA cases are a sample of those I have worked on substantively which have been approved by the courts: (1) Salinas et al. v. True World Foods Los Angeles (18STCV01288– Judge Nelson); (2) Estrada v. TT Fremont Holding, Inc. (19CHCV00193 – Judge Sandvig); (3) Visket v. LA Solar Group Inc (LS030122 – Judge Cotton); (4) Nicholas v. Rockstar Beverage Corp. (19STCV18234 – Judge Court); (5) Glassel v. Toscanova (20VECV00755 – Judge Keeny); (6) Arceo v. Volcano Grill, Inc. (19BBCV00473 – Judge Kralik); (7) Martinez v. Alfred Club, LLC (19STCV44314- Judge Jones) – (8) Aivazian v Lakeside Medical

1 Group (BC701224-Judge Nelson); (9) Gragoosian v. Volt Management Corporation
2 (20STCV28854- Judge Fruin); (10) Hill v. Prime Healthcare Centinela, LLC
3 (20TRCV00071- Judge Tanaka); (11) Ramirez v. Melrose Gardens LA, LLC
4 (21STCV05842- Judge Tamzarian); (12) Gutierrez v Buca, Inc. (19BBCV01008- Judge
5 Kralik); (13) Gonzalez v 4 Over, LLC, et al. (18STCV01287 – Judge Riff).; (14)
6 Landeros v Gardner Management, Ltd. (20STCV03151 Judge Palazuelos); (15)
7 Bustamante v Calwest Refrigeration, Inc. (CIVSB2119755 Judge Cohn); (16) Baez v
8 Centinela Skilled Nursing & Wellness Centre, East, LLC (21TRCV00270 Judge
9 Tanaka); (17) Hill v. Prime Healthcare Centinela, LLC (20TRCV00071- Judge Tanaka);
10 (18) Kim v. Hi-Temp Metals, Inc. (21CHCV00176 Judge Pfahler).; (19) Rhyoo v. Loan
11 depot (VECV01419 – Judge Cotton); (20) Medina v. Caden (19VECV00781 Judge
12 Virginia Keeny); (21) Lopez-Casillas v. PHC Service Co. (21STCV08874 Judge Stephen
13 I. Goorvitch); (22) Banks v. Carter Saco Logistics (21CHCV00399 Judge Stephen P.
14 Phahler); (23) Gamil v. 444-448 W. Windsor, LLC, (22GDCV00100 - Judge David A.
15 Rosen) and (24) Mota v. Mt. Olive, (22PSCV00154- Judge Sirna Savatore).

16 5. I believe the settlement is fair, reasonable, and in the best interests of the class.

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

19 Executed this 6th day of November, 2023, at Glendale, California.

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22 CATHY GONZALEZ