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and Proposed Class Counsel  
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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **FOR THE COUNTY OF LOS ANGELES – LONG BEACH COURTHOUSE**  
12

13 KEVIN PUGH, on behalf of himself and all  
14 “aggrieved employees” pursuant to Labor  
Code § 2698 *et seq.*,

15 Plaintiff,

16 v.

17 THE AIRPORT COLLECTIVE, INC., a  
18 California corporation, and DOES 1 through  
19 10, inclusive,

20 Defendants.  
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CASE NO: 21LBCV00333

*Assigned to the Honorable Mark C. Kim,  
Dept. S27*

**CLASS ACTION**

**DECLARATION OF KEVIN PUGH IN  
SUPPORT OF UNOPPOSED MOTION  
FOR FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT AND  
UNOPPOSED APPLICATION FOR  
APPROVAL OF ATTORNEYS’ FEES  
AND COSTS, CLAIMS  
ADMINISTRATION FEES, AND CLASS  
REPRESENTATIVE’S SERVICE  
PAYMENT**

**DATE: January 12, 2023**

**TIME: 8:30 a.m.**

**DEPT.: S27**

*Action Filed: June 18, 2021*

DECLARATION OF KEVIN PUGH IN SUPPORT OF UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT AND UNOPPOSED APPLICATION FOR APPROVAL OF ATTORNEYS’ FEES AND COSTS,  
CLAIMS ADMINISTRATION FEES, AND CLASS REPRESENTATIVE’S SERVICE PAYMENT

1 I, Kevin Pugh, hereby declare and state as follows:

2 1. I am the named Plaintiff in this lawsuit against Defendant The Airport  
3 Collective, Inc. ("Defendant"). I submit this declaration in support of Plaintiff's  
4 Unopposed Motion for Final Approval of Class Action Settlement and Plaintiff's  
5 Unopposed Application for Attorneys' Fees and Costs, Claims Administration Fees, and  
6 Class Representative's Service Payment. I am a competent adult and worked for  
7 Defendant as a non-exempt employee during the Class Period. I have personal  
8 knowledge of the facts set forth herein, and if called as a witness to testify to them, I  
9 could and would do so competently.

10 2. I contacted my current attorneys when I questioned the employment  
11 practices of Defendant prior to commencing this lawsuit. I accepted the opportunity to  
12 act as a Class Representative in a class action on behalf of other employees of Defendant  
13 who I believed were being subjected to labor law violations. I did not to pursue this case  
14 on an individual basis and instead did so as a class action so that I could help other  
15 employees recover for what I believed were Defendant's illegal practices.

16 3. When I first contacted my attorneys, I questioned Defendant's policies of  
17 failing to provide meal and rest breaks, failing to reimburse business expenses, issuing  
18 its employees incorrect paystubs, and failing to timely pay wages. I suspected, then  
19 confirmed, that these may be illegal practices and Defendant's employees might have  
20 recourse for them.

21 4. I have put the interests of the class ahead of my own. I understood that I  
22 could possibly earn a small enhancement payment if this case resolved itself favorably,  
23 but always knew that I could also be responsible for paying Defendant's attorneys' fees  
24 and costs if it did not. My goal in bringing this lawsuit was to put an end to what I  
25 believed were illegal practices on the part of Defendant. I believe I have achieved this  
26 goal through this lawsuit and settlement.

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1           5.       I am very happy about the results of this litigation. I am satisfied that  
2 Defendant is compensating class members for damages, wages, penalties and interest  
3 that I believe we are due.

4           6.       At the onset of this case, I spent time through numerous phone calls with  
5 several of my attorneys explaining what I understood to be the policies and procedures  
6 of Defendant and how they were applied to me and others I worked with. During the  
7 course of this litigation, up through and following the settlement process, I kept actively  
8 involved with its status, tracking the status of the case and participating as much as  
9 possible.

10          7.       While I have not maintained detailed time records of my activities in  
11 connection with this litigation, I believe that have spent a total of approximately 17  
12 hours assisting my attorneys with the preparation of this case, and doing work and  
13 analysis independent from my attorneys both before and during this case, including  
14 conducting an independent investigation of the facts.

15          8.       Before this litigation commenced, and throughout its course, I have spent  
16 approximately 5 or more hours gathering, organizing, and reviewing documents and  
17 information for this lawsuit. I sifted through many of my own documents and reviewed  
18 information produced by Defendant as part of this case.

19          9.       I have frequently communicated with my attorneys to track my case's  
20 status. I have taken an active involvement in this matter throughout its course.

21          10.       This lawsuit will almost certainly result in reputational harm to me. There  
22 is a stigma associated with suing anyone, let alone your former employer. I will  
23 probably be adversely affected when it comes to obtaining future employment –  
24 employers who learn that I sued Defendant in a class action will likely avoid hiring me.

25          11.       I do not believe that I have any conflicts with other members of the class.  
26 My interests in bringing this lawsuit – for Defendant to change its labor practices going  
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1 forward and to compensate current and former employees – are the same as those of all  
2 other class members.

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

5 Executed on this 12 / 21 / 2022 day of December, 2022 at Santa Ana, California.

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9 KEVIN PUGH  
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## Document History

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