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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

KENNETH MURRAY, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

NEW WORLD VAN LINES OF SAN
FRANCISCO, a California Corporation; NEW
WORLD VAN LINES, an unknown business
entity; and DOES 1 through 100, inclusive,

Defendants.

Case No. RG21095207

Honorable Brad Seligman
Department 23

CLASS ACTION

**DECLARATION OF KENNETH
MURRAY IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Annabel Blanchard); and
[Proposed] Order filed concurrently
herewith]

Date: August 23, 2022
Time: 3:00 p.m.
Department: 23

Reservation No.: A-21095207-001

Complaint Filed: April 6, 2021
Trial Date: None Set

DECLARATION OF KENNETH MURRAY

I, **Kenneth Murray**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff 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 was employed by New World Van Lines of San Francisco and New World Van Lines, Inc. (together, “New World”) from approximately March 2015 to approximately April 2020 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences with New World and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with the attorneys there. I wanted to do whatever I could do to make sure New World paid me and other employees what was owed to us and stopped its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **7 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **8 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and PAGA representative.

3. I have spent over **15 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which has included providing documents concerning my employment with New World, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of hourly-paid or non-exempt employees, and helping develop a strategy as to what documents and information to obtain from New World. 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.

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1 4. Throughout the case, I was available to answer any questions my attorneys had,
2 and available to speak and meet with my attorneys whenever they needed me. I responded to
3 them as quickly as possible and gave them as much information as I could. I spent at least **13**
4 **additional hours** speaking with my attorneys about the case, identifying potential witnesses,
5 providing my attorneys with documents and information concerning the case, and also describing
6 policies, practices, and procedures of New World.

7 5. As far as the settlement is concerned, I was available to review documents and
8 answer questions my attorneys had. I spent about **4 hours** reviewing the settlement agreement
9 and about **3 hours** asking questions and discussing the potential settlement with my attorneys
10 before signing the settlement agreement.

11 6. I believe that I have done everything that my attorneys have asked of me and have
12 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
13 and the State of California. I think my efforts helped to get the result obtained in this case, and
14 as a class and PAGA representative, I respectfully request that the Court award me a class
15 representative service award in the amount of \$7,500.00 for my active participation in this case.
16 Taking into consideration the time that I have dedicated to this case, I believe that this amount is
17 reasonable.

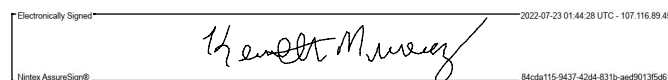
18 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

19 8. I have not entered into any undisclosed agreements, nor have I received any
20 undisclosed compensation in this case. The only compensation I will receive is whatever amount
21 the Court awards as a class representative service award, as well as my share of the settlement as
22 a class member and as an aggrieved employee.

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

07/22/2022

25 Executed this ____ day of July 2022, at Oakland, California.

26 The signature block contains a handwritten signature "Kenneth Murray" in black ink. Above the signature, the text "Electronically Signed" is visible. To the right of the signature, the date and time "2022-07-23 01:44:28 UTC - 107:116.89.45" are printed. Below the signature, the text "Nintex AssuranceSign®" and a long alphanumeric string "84cda115-9437-42d4-831b-aed9013f5d61" are visible.

27 Kenneth Murray