Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Selena Matavosian (SBN 348044)
LAWYERS *for* JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SACRAMENTO

TERESA BOND, JESSE ZAMARRIPA, individually, and on behalf of other members of the general public similarly situated; REYNEIRO LARIOS, individually, and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act,

Plaintiffs,

v.

HANGER, INC., an unknown business entity; HANGER ORTHOPEDIC GROUP, INC., an unknown business entity; HANGER PROSTHETICS & ORTHOTICS, INC., a Delaware corporation; HANGER PROSTHETICS & ORTHOTICS WEST, INC., a California corporation; HANGER FABRICATION NETWORK, LLC, an unknown business entity; and DOES 2 through 100, inclusive,

Defendants.

Case No.: 34-2021-00303204-CU-OE-GDS

Honorable Lauri A. Damrell
Department 28

CLASS ACTION

DECLARATION OF TERESA BOND IN SUPPORT OF PLAINTIFFS' 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 (Selena Matavosian); Declarations of Proposed Class Representatives (Reyneiro Larios and Jesse Zamarripa); and [Proposed] Order filed concurrently herewith.]

Reservation ID:	A-303204-001
Date:	August 4, 2023
Time:	9:00 a.m.
Department:	28
Complaint Filed:	June 23, 2020
FAC Filed:	December 27, 2022
Trial Date:	None Set

LAWYERS *for* JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203

LAWYERS *for* JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203

DECLARATION OF TERESA BOND

I, **Teresa Bond,** 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 was employed by Hanger Prosthetics & Orthotics, Inc. ("Hanger") as an hourly-paid office administrator from approximately September 2015 to approximately March 2018. I decided to seek legal advice about my work experiences with Hanger and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Hanger paid me and other employees what was owed to us 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 in general, and what it meant to commence a class action lawsuit as a named plaintiff and class representative.

3. I have spent over 15 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with Hanger, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Hanger. 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 11 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 Hanger.

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 hours reviewing the settlement agreement and about 3 hours asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

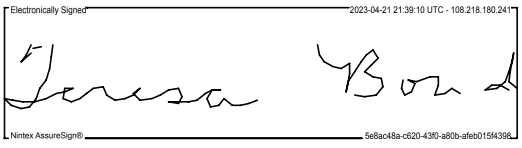
6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class. I think my efforts helped to get the result obtained in this case, and as a class representative, I respectfully request that the Court award me an incentive award 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 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 me as an incentive award, 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 04/21/2023 day of April 2023, at Riverside, California.



Teresa Bond

LAWYERS *for* JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203