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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

RYAN EDWARDS, individually,
and on behalf of other members of
the general public similarly situated;

Plaintiff,

vs.

COSTCO WHOLESALE
CORPORATION, an unknown
business entity; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 5:21-cv-00716-MWF-KK

Honorable Michael W. Fitzgerald

**DECLARATION OF RYAN
EDWARDS IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date:
Time: 10:00 a.m.
Department: 5A

Complaint Filed: February 8, 2021
FAC Filed: June 1, 2021
SAC Filed: August 4, 2021
Jury Trial Date: None Set

DECLARATION OF RYAN EDWARDS

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DECLARATION OF RYAN EDWARDS

I, Ryan Edwards, 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 Costco Wholesale Corporation (“Costco”) as an hourly-paid, non-exempt employee from approximately May 2018 to approximately October 2020. I decided to seek legal advice about my work experiences with Costco 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 that Costco 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 11 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 10 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 16 hours communicating with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Costco, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Costco. I routinely checked in with my attorneys and their staff to make sure they

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1 had all of my most current information and any additional information that I had
2 obtained.

3 4. I was available to answer any questions my attorneys had, and
4 available to speak and meet with my attorneys whenever they needed me. I
5 responded to them as quickly as possible and gave them as much information and
6 identified as many documents as I could. I spent at least 14 additional hours
7 working with my attorneys to prepare Initial Disclosures, speaking with my
8 attorneys about the case, identifying potential witnesses, providing my attorneys
9 with documents and information concerning the case, and also describing policies,
10 practices, and procedures of Costco.

11 5. On November 5, 2021, I attended a full day remote deposition that
12 lasted approximately 5.75 hours. I spent at least 4 hours preparing for the
13 deposition. After the deposition, I spent at least 3 hours reviewing my testimony
14 and discussing the contents of the deposition transcript with my attorneys.

15 5. As far as the settlement is concerned, I was available to review
16 documents and answer any questions my attorneys had. I spent about 4 hours
17 reviewing the settlement documents and about 3 hours asking questions and
18 discussing the potential settlement with my attorneys before signing the settlement
19 agreement.

20 6. I believe that I have done everything that my attorneys have asked of
21 me and have tried, to the best of my ability, to represent the class and seek relief
22 for the aggrieved employees and the State of California. I think my efforts have
23 helped to obtain the result in this case, and as a class and PAGA representative, I
24 respectfully request that the Court award me a Service Award in the amount of
25 \$15,000.00 for my active participation in this case. Taking into consideration the
26 time that I have dedicated to this case, I believe that this amount is reasonable.

27 ///

28 ///

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

2 8. I have not entered into any undisclosed agreements, nor have I
3 received any undisclosed compensation in this case. The only compensation I will
4 receive is whatever amount the Court awards as a Service Award, as well as my
5 share of the settlement as a class member and as an aggrieved employee.

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

8 Executed this ^{02/09/2023} _____ day of February 2023, at Riverside, California.

9
10 The signature block contains a handwritten signature of Ryan Edwards. Above the signature, the text 'Electronically Signed' is visible. To the right of the signature, a timestamp '2023-02-09 18:40:18 UTC -104176.137.82' is present. Below the signature, the text 'Nintex AssureSign®' is visible on the left, and a long alphanumeric string '7f155597-871c-4ab9-9e4c-af401323968' is visible on the right.

Ryan Edwards

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