

Jacob N. Whitehead (SBN 266123)
jacob@wemploymentlaw.com
W EMPLOYMENT LAW, APC
7700 Irvine Center Drive, Suite 930
Irvine, California 92618
Telephone: (949) 674-4922

Counsel for Plaintiffs and Settlement Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

JOSEPH MONTAGUE, an individual,
MICHAEL DUPONT, an individual,
CURTIS MOORE, an individual,
CHARISSEE TABOTABO, an individual,
RENAE HILLOCK, an individual, UNINI
ODAIBO an individual, MICHAEL LATHE,
an individual, BRENT MILLER, an
individual, GIANCARLO VELLEJO, an
individual, and BENJAMIN TACDERAS, an
individual,

Plaintiffs,

vs.

GLOBAL CONNECTIONS TO
EMPLOYMENT, INC., a Florida
corporation, and DOES 1-50, inclusive,,

Defendants.

Case No. 37-2022-00004601-CU-OE-CTL

CLASS ACTION

**DECLARATION OF CURTIS MOORE, IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS AND
REPRESENTATIVE ACTION
SETTLEMENT, ATTORNEYS' FEES AND
COSTS AND SERVICE AWARDS**

Judge: Hon. Matthew C. Braner
Date: February 9, 2024
Time: 9:00 a.m.
Dept.: C-60

Filed: February 3, 2022
Trial Date: None Set

1 I, CURTIS MOORE, declare as follows:

2 1. I am an adult over 18-years old. I am a named plaintiff and Class Representative in
3 this Action. All the facts set forth in this declaration are known to me personally, and if called to
4 testify about these facts, I would do so in a competent and truthful manner. I make this declaration
5 in support of Plaintiff's Motion for Attorneys' Fees and Class Counsel Costs, Class Representative
6 Enhancement Payments, and Claims Administrator Costs (the "Fee Application").

7 2. In or about late February or early March of 2021, I spoke with attorney, Jacob
8 Whitehead regarding my employment experience with Global Connections to Employment, Inc.
9 ("GCE") Mr. Whitehead consulted and interviewed me, asked a lot of questions and then asked me
10 for any documents I had related to my employment with GCE. I spent quite a lot of time searching
11 through my files and records to locate documents requested by Mr. Whitehead. I provided him
12 whatever I was able to find, including my onboarding documents, various emails and text messages,
13 related to my employment. In follow up conversations, I telephonically conferred with Mr.
14 Whitehead multiple times to discuss in greater detail my personal experience being recruited by and
15 working for GCE and answering questions regarding GCE's policies, procedures and practices. I
16 was advised that GCE may have engaged in certain practices that were potentially unlawful, which
17 affected not only me, but other employees who also worked for Defendant.

18 3. After those preliminary investigation and conversations Mr. Whitehead and I
19 discussed my legal options. He told me I could participate in the class action to represent and
20 potentially benefit other GCE Training Specialists like myself, who may have been affected by the
21 alleged unlawful conduct. He explained the class action process and what would be entailed and
22 what would be expected of me as a representative plaintiff. It was explained that suing on behalf of
23 other GCE employees might subject me to a stigma sometimes associated with those who bring class
24 actions against their employers, which could affect my ability to find future employment. It was also
25 explained that if I chose that route, it carried certain risks, including the possibility of having to pay
26 Defendant's costs and/or its attorneys' fees which might be substantial— if we lost the case. After
27 balancing the potential claims and remedies against the risks, I decided that I wanted to go forward
28 and participate in the lawsuit not only for myself but would be willing to work on behalf of the

1
2 potential Class members.

3 4. I provided my attorney additional feedback confirming factual details for the
4 Complaint that was filed on February 3, 2022.

5 5. Over the past two years, I have remained in communication with my attorney, Jacob
6 Whitehead of W Employment Law, his associate attorney and other support staff. I did whatever
7 was asked of me, and participated in answering lots of questions and made myself available to
8 answer any further questions or to provide additional data or records in my possession in order to
9 advance the litigation and protect the interests and rights of the other similarly situated class
10 members. As a result of my contribution, participation and work on the case and the risks I took, the
11 Class Members will receive a meaningful, monetary benefit right away. Conservatively speaking,
12 I believe I have expended at least 75 hours or more on this Action, during the past 18 months that I
13 have been involved in the lawsuit. I believe a \$2,500 Service Award is not only appropriate, but
14 reasonable considering (1) the emotional and mental stresses of dealing with this Action, and the
15 potential of having a judgment entered against me if I had lost; (2) exposure to costs if Defendant
16 won; (3) the real potential of losing job opportunities because I filed this Action; (4) if I had not
17 risked being the named plaintiff and Class Representative, the Class members would have received
18 nothing; and (5) for the amount of time and effort I dedicated to this Action, which was time lost
19 from being with my family, friends and work.
20

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

23 Executed on Jan 9, 2024 at Chula Vista, California.

24 *Curtis Moore*

25 CURTIS MOORE
26
27
28