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Attorneys for Plaintiff JAMES PACKES, individually, and on behalf of other members of the general public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

JAMES PACKES, in a Representative
capacity only, and on behalf of other
members of the general public similarly
situated,

Plaintiff,

v.

SCHOOL OF ROCK LLC, a Delaware
Limited Liability Company; and DOES 1-10,
inclusive

Defendants

CASE NO. 30-2021-01217507-CU-OE-CXC

**DECLARATION OF JAMES PACKES IN
SUPPORT OF PLAINTIFF'S UNOPPOSED
MOTION FOR FINAL APPROVAL OF (1)
CLASS ACTION SETTLEMENT; (2)
ATTORNEYS' FEES AND COSTS; and (3)
CLASS REPRESENTATIVE AWARD**

Date: May 5, 2023
Time: 10:00 a.m.
Dept.: CX105
Judge: Hon. Randall J. Sherman

1 I, James Packes, hereby declare as follows:

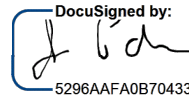
- 2 1. I am the named Plaintiff in the above-captioned matter. I have personal knowledge of the facts
3 set forth in this declaration and if called to testify as a witness, I could and would do so. I make
4 this declaration in support of Plaintiff's Unopposed Motion for Final Approval of Class Action
5 Settlement, Attorneys Fees and Costs, and Class Representative Award.
- 6 2. I am personally familiar with the facts set forth in this declaration, and if called to testify as a
7 witness I could and would do so.
- 8 3. To my recollection, I met with my Attorneys on at least 2 occasions.
- 9 4. During these meetings, I would review and explain certain documents numerous documents
10 turned over by Defendants from my employment and explain my role (as well as others) during
11 work. I also helped identify numerous other employees who I believed would support the
12 claims I was making in this lawsuit.
- 13 5. I also spoke with my attorneys on the phone, on at least 10 other occasions. I agreed to have
14 my deposition taken. I also spent significant time helping my attorneys prepare for mediation,
15 reviewing the settlement documentation and discussing the settlement with my attorneys.
- 16 6. In total, I estimate that I spent at least 25 hours related to the above mentioned tasks directly
17 working with my attorneys. I also spent at least another 6-8 hours of my own time gathering
18 evidence and outlining issues that I later shared with my attorneys.
- 19 7. I was counseled by my attorneys, when I decided to move forward with this case, of the
20 potential stigma of being a Class Representative in a class action dispute, as this is a publicly
21 filed lawsuit.
- 22 8. I was also advised when I brought this case that had we lost, I could have been personally
23 liable for paying all of Defendants' costs. I was further advised this could be well into the tens
24 of thousands of dollars on this type of case.

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1 9. Despite these risks I was committed to achieving a settlement that would benefit all employees
2 working for School of Rock.

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4 I declare under penalty of perjury under the laws of the State of California that the foregoing
5 is true and correct. Executed this 13th day of April, 2023 at San Diego, California.

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DocuSigned by:

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JAMES PACKES