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Attorneys for Plaintiff and the proposed class
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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

EMMANUEL WRIGHT, individually and on
behalf of all others similarly situated,

PLAINTIFF,

v.

HOME BOX OFFICE, INC.; PLANE MEETS
PAPER PRODUCTIONS, LLC; and DOES 1
through 50, inclusive,

DEFENDANTS.

CASE NO. 21STCV19636

[Case Assigned for All Purposes to Hon. Maren
E. Nelson in Dept. 17]

**DECLARATION OF EMMANUEL
WRIGHT IN SUPPORT OF
PRELIMINARY APPROVAL OF CLASS
SETTLEMENT**

Date: January 8, 2024

Time: 9:00 a.m.

Dept.: 17

Complaint Filed: May 24, 2021

Trial Date: None Set

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Attorneys for Plaintiff and the Proposed Class

DECLARATION OF EMMANUEL WRIGHT

I, EMMANUEL WRIGHT, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendants HOME BOX OFFICE, INC.; PLANE MEETS PAPER PRODUCTIONS, LLC (collectively, "Defendants").

3. I brought this lawsuit, on behalf of myself and all other Class members, against Defendants because I believe that Defendants failed to pay all wages and/or overtime, failed to pay all minimum wages, failed to provide lawful meal and rest periods, failed to reimburse business-related expenses, failed to issue accurate itemized wage statements and failed to pay wages owed at time of separation to me and other employees.

4. I understand that I am representing other employees and I believe that I am able to represent them well.

5. I first researched experienced attorneys who are very experienced with these types of lawsuits. Once retained, I compiled relevant documents from my employment to assist my attorneys in litigating this case. I worked with my attorneys to develop the facts and legal claims in this lawsuit. The lawsuit was filed in May 24, 2021.

6. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the Settlement as needed. Additional work in connection with this matter includes providing information to my attorneys regarding my employment with Defendants, staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my attorneys' various communications regarding this matter, attending a full-day mediation in February 23, 2023; and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of the Class members.

7. I have worked to actively represent the other Class members and their interests.

8. I have always kept the Class members interests at heart in this litigation.

9. I am prepared to continue assisting with this litigation and am committed to

1 achieving the best possible results for the Class.

2 10. I believe that the class action settlement obtained on behalf of the Class is fair and
3 reasonable in light of the issues involved in this case. As mentioned above, I reviewed and
4 discussed the Settlement with my attorneys and asked them questions about it to ensure that I
5 understood its terms and what it would mean for all of the class members.

6 11. I believe that I have fairly represented the absent Class and request that the Court
7 finally approve this settlement and confirm me as Class Representative.

8 12. I am not aware of any conflicts of interest that prevent me from being confirmed as
9 Class Representative in this action. I am not related in any way to my attorneys or to any other
10 member of the firm that is representing me. I have no business dealings or other involvement
11 beyond this lawsuit and this representation. I have not been promised any money or inducement
12 to serve as Class Representative in this action.

13 13. It is my opinion that the settlement agreement provides for a fair and adequate
14 enhancement for me as a Class Representative, in the amount of \$5,000. I believe that this is fair
15 and reasonable in light of all of the work that I have performed in my role as Class Representative.
16 As Class Representative, I have actively participated in all stages of the litigation, as detailed
17 above, and have always maintained the best interests of the Class while performing my Class
18 Representative duties.

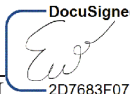
19 14. It is also my opinion that the Class Representative enhancement is fair, reasonable,
20 and adequate because, in addition to the many hours spent participating in the prosecution of this
21 case, I accepted the potential risk of being liable for Defendants' attorneys' fees and costs if we
22 were unsuccessful in this action. Likewise, I risk the potential stigma of being a Class
23 Representative in a class action labor dispute, which may affect my future employability.

24 15. I am also aware that my attorneys, Kingsley & Kingsley, APC, Kim Legal, APC,
25 and Helen Kim Law, APC have all agreed to share fees in this Action, and that Kingsley &
26 Kingsley, APC will receive 50% of the fee and Kim Legal, APC, and Helen Kim Law, APC will
27 receive the other 50%.

28 16. I signed off on this fee sharing arrangement on July 14, 2022.

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

3 Executed this 11 day of September, 2023 at Los Angeles,
4 California.

5 DocuSigned by:
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7 EMMANUEL WRIGHT
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(PROOF OF SERVICE)

[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On September 11, 2023, I served all interested parties in this action the following documents described as: **DECLARATION OF EMMANUEL WRIGHT IN SUPPORT OF PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

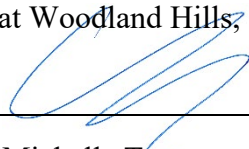
Maria C. Rodriguez mrodriguez@mwe.com Chris Braham cbraham@mwe.com Ariel Beverly abevery@mwe.com Yvonne Rivera yrivera@mwe.com Cindy Liu cliu@mwe.com McDermott Will & Emery LLP 2049 Century Park East, Suite 3200 Los Angeles, CA 90067-3206 <i>Attorneys for Defendants</i>	Frank H. Kim fkim@kim-legal.com KIMLEGAL, APC 3435 Wilshire Blvd, Suite 2700 Los Angeles, CA 90010 Helen U. Kim helen@helenkimlaw.com HELEN KIM LAW, APC 3435 Wilshire Blvd, Suite 2700 Los Angeles, CA 90010 <i>Attorneys for Plaintiff</i>
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[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL THROUGH CASE ANYWHERE): On interested Parties set forth on the service list.

[XX] (STATE): I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 11, 2023, at Woodland Hills, California.



Michelle Tanzer