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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

PEDRO GERMAN, individually, and on behalf
of other members of the general public similarly
situated and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiff,

vs.

FRESH LINK LOGISTICS, LLC, a California
limited liability company; and DOES 1 through
100, inclusive,

Defendant.

Case No.: BC719412

Honorable Amy D. Hogue
Department SSC7

CLASS ACTION

**DECLARATION OF PEDRO GERMAN
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Plaintiff's Motion for Preliminary Approval
of Class Action Settlement; Declaration of
Proposed Class Counsel (Edwin Aiwazian);
and [Proposed] Order filed concurrently
herewith]

Date:
Time:
Department: SSC7

Complaint Filed: August 28, 2018
FAC Filed: January 14, 2019
SAC Filed:
Jury Trial Date: None Set

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1 could. I spent at least 5 additional hours speaking with my attorneys about the case, identifying
2 potential witnesses, providing my attorneys with documents and information concerning the
3 case, and also describing policies, practices, and procedures of Defendant. During the discovery
4 phase of the litigation, I spent approximately 4 additional hours reviewing Defendant's discovery
5 requests, locating documents, and providing documents, responses, and supplemental responses
6 to my attorneys.

7 5. On November 12, 2019, I attended a full day of deposition that lasted
8 approximately 5 hours. I spent at least 3 hours preparing for the deposition and approximately
9 2.5 additional hours traveling to and from the deposition. After the deposition, I spent at least 2
10 hours reviewing my testimony and discussing the contents of the deposition transcript with my
11 attorneys.

12 6. As far as the settlement is concerned, I was available to review documents and
13 answer any questions my attorneys had. I spent about 1.5 hours reviewing the settlement
14 agreement and an additional hour asking questions and discussing the potential settlement with
15 my attorneys before signing the settlement agreement.

16 7. I believe that I have done everything that my attorneys have asked of me and have
17 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
18 and the State of California. I think my efforts helped to get the result obtained in this case, and
19 as a class and PAGA representative, I respectfully request that the Court award me a service
20 award in the amount of \$5,000.00 for my active participation in this case. Taking into
21 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

22 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

23 9. I have not entered into any undisclosed agreements, nor have I received any
24 undisclosed compensation in this case. The only compensation I will receive is whatever amount
25 the Court awards as a service award, as well as my share of the settlement as a class member and
26 as an aggrieved employee.

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

10/19/2021

Executed this ____ day of October 2021, at Bell, California.

Electronically Signed: 2021-10-19 18:28:44 UTC - 172.58.16.38
AssureSign® 291e79ea-5695-46a7-aea7-acc6012d5b3b

Pedro German