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Attorneys for Plaintiff and the Class

**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 Lawrence P. Riff
Department SSC7

CLASS ACTION

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

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Service Award;
Declaration of Class Counsel (Edwin
Aiwaizian); Declaration of Settlement
Administrator (Lindsay Kline); and
[Proposed] Final Approval Order and
Judgment filed concurrently herewith]

Date: December 27, 2022
Time: 11:00 a.m.
Department: SSC7

Complaint Filed: August 28, 2018
FAC Filed: January 14, 2019
SAC Filed: October 21, 2021
Trial Date: None Set

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1 4. Throughout the case, I was available to answer any questions my attorneys had, and
2 available to speak and meet with my attorneys whenever they needed me. I responded to them as
3 quickly as possible and gave them as much information and identified as many documents as I
4 could. I spent at least 5 additional hours speaking with my attorneys about the case, identifying
5 potential witnesses, providing my attorneys with documents and information concerning the
6 case, and also describing policies, practices, and procedures of Defendant. During the discovery
7 phase of the litigation, I spent approximately 4 additional hours reviewing Defendant's discovery
8 requests, locating documents, and providing documents, responses, and supplemental responses
9 to my attorneys.

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

15 6. As far as the settlement is concerned, I was available to review documents and
16 answer any questions my attorneys had. I spent about 1.5 hours reviewing the settlement
17 agreement and an additional 2 hours asking questions and discussing potential settlement,
18 mediation and outcome thereof, settlement paperwork, and amended settlement paperwork with
19 my attorneys before signing the settlement agreement.

20 7. I understand that a settlement has been reached in my case to resolve the class and
21 PAGA claims, and I further understand what my duties and responsibilities are as a class and
22 PAGA representative. For example, I am aware that if the settlement is granted preliminary
23 approval, the Court will certify a class for settlement purposes, and likely appoint me as the
24 representative of the class and my attorneys as counsel for the class. I also understand that I will
25 be tasked with checking in on, monitoring, and conferring with my attorneys and counsel for the
26 class to facilitate the notice and settlement administration process, and to provide information
27 that the Court needs to assess whether the settlement is fair, reasonable, and adequate. Further, if
28 any individuals who are potential class members contact me, I will take steps to have them

1 referred to the Court-appointed settlement administrator so that these individuals may receive
2 whatever information and notice they may be eligible to receive in connection with the
3 settlement and contemplated final approval hearing.

4 8. I believe that I have done everything that my attorneys have asked of me and have
5 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
6 and the State of California, and that my interests are not in conflict with the interests of other
7 class members. I think my efforts helped to get the result obtained in this case, and as a class and
8 PAGA representative, I respectfully request that the Court award me a service award in the
9 amount of \$5,000.00 for my active participation in this case. Taking into consideration the time
10 that I have dedicated to this case, I believe that this amount is reasonable.

11 9. I am not related to anyone associated with Lawyers *for* Justice, PC.

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

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

06/03/2022

18 Executed this ____ day of June 2022, at Bell, California.

19  Electronically Signed 2022-06-03 21:44:31 UTC - 172.56.17.84
20 Nintex AssureSign® 21405e81-bc0f-4be0-b4f5-aea80145117e

21 Pedro German