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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

MANNY HANECH ZIPERMAN an
individual, behalf of the State of California, as
a private attorney general,

PLAINTIFF,

v.

PARKWAY MOTORCARS VALENCIA
INC. DBA PARKWAY BUICK GMC
CADILLAC; and DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. 21STCV31959

[Case Assigned for All Purposes to Hon. Holly
J. Fujie in Dept. 56]

**DECLARATION OF MANNY HANECH
ZIPERMAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
REPRESENTATIVE ACTION
SETTLEMENT**

Date: March 7, 2024
Time: 8.30a.m.
Dept.: 56

Complaint Filed: August 30, 2021
Trial Date: None Set
Reservation No. **456564842760**

DECLARATION OF MANNY HANECH ZIPERMAN

I, Manny Hanech Ziperman, state and declare as follows:

1. I am a competent adult, over the age of eighteen and the Class Representative Plaintiffs in the matter of MANNY HANECH ZIPERMAN an individual, on behalf of the State of California, as a private attorney general, v. Parkway Motorcars Valencia Inc. dba Parkway Buick GMC Cadillac; and DOES 1 thru 50, inclusive, Los Angeles County Superior Court, Case No. 21STCV31959. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto. I am making this sworn declaration in support of my claims and the claim of my co-workers, and in support of my qualifications as Class Representative. If called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I worked as an employee for Parkway Motorcars Valencia Inc. dba Parkway Buick GMC Cadillac ("Defendant" or "Parkway").

3. As an employee of Defendant, I regularly did not receive thirty (30) minute uninterrupted meal periods within the first five (5) hours of my shift when working five hours or more. I also regularly was not provided with ten-minute paid rest periods for every major fraction of four hours that I worked.

4. I have spent significant time throughout this class action working with Class Counsel. Before filing this action, on August 30, 2021, I researched and identified Counsel that I believed could best represent the interests of the Class Members. I also assisted the attorneys with investigation and gathering of information including discussing my work experience and the experience of others that I had observed while working for Parkway and provided all relevant employment documents in my possession. In addition, I attended a full-day mediation on August 22, 2023. While at the Mediation, I actively participated in the discussions with the Class Counsel and shared my knowledge and insights in order to help the Class obtain a favorable settlement.

5. Throughout the entirety of this litigation, I have maintained regular contact with Class Counsel and assisted in any way possible by providing information and making myself available as needed.

8. It is my opinion that a fair and adequate Class enhancement for me as a Class Representative is \$5,000.00. I believe that it is fair and reasonable in view of all of the work I have performed in my role as a Class Representative. As Class Representative, I actively participated in all stages of the litigation as detailed above and have always maintained the best interest of the Class while performing my Class Representative duties.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 1st day of February, 2024 at Simi valley, California.

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DECLARATION OF MANNY HANECH ZIPERMAN IN SUPPORT OF PLAINTIFF'S MOTION FOR REPRESENTATIVE ACTION SETTLEMENT

1 (PROOF OF SERVICE)

2 [CCP 1013(a)(3)]

3 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

4 I am employed in the County of Los Angeles, State of California. I am over the age of 18
5 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite
6 1200, Encino, California 91436.

7 On February 13, 2024, I served all interested parties in this action the following documents
8 described as: **DECLARATION OF MANNY HANECH ZIPERMAN IN SUPPORT OF**
9 **PLAINTIFF'S MOTION FOR REPRESENTATIVE ACTION SETTLEMENT** by placing
10 a true copy thereof enclosed in a sealed envelope addressed as follows:

11 Robert W. Thompson
12 rthompson@ctsclaw.com
13 Alex A. Zolg
14 azolg@ctsclaw.com
15 **CALLAHAN, THOMPSON, SHERMAN**
16 **& CAUDILL LLP**
17 2601 Main Street, Suite 800
18 Irvine, California 92614

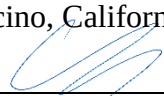
19 Emil Davtyan
20 emil@d.law
21 **D.LAW, INC.**
22 400 N. Brand Blvd, 7th Floor
23 Glendale, CA 91203

24 [XX] (BY ELECTRONIC SERVICE) I caused a true and correct copy thereof to be
25 electronically filed using the Labor and Workforce Development Agency Electronic Filing
26 ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic
27 means by transmittal of the documents referenced herein on the EF System.

28 [XX] (BY ELECTRONIC MAIL TRANSMISSION) I caused the document to be sent to the
persons at the e-mail address(es) listed on the attached service list. I did not receive, within
a reasonable time after the transmission, any electronic message or other indication that the
transmission was unsuccessful. A pdf copy of which was sent via email to the above email
address(es)..

[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 February 13, 2024, at Encino, California.



Michelle Tanzer