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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

JAMIE BRESSMAN, 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.

ROSS AVIATION OPERATIONS, LLC, a
Delaware limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 21STCV30675

Honorable Stuart M. Rice
Department SSC-1

CLASS ACTION

**DECLARATION OF JAMIE BRESSMAN
IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT,
ATTORNEYS' FEES, COSTS, AND
ENHANCEMENT PAYMENT**

[Plaintiff's Motion for Final Approval of
Class Action Settlement, Attorneys' Fees,
Costs, and Enhancement Payment;
Declaration of Class Counsel (Helene
Mayer); Declaration of Settlement
Administrator (Lisa Palvik); and [Proposed]
Final Approval Order and Judgement filed
concurrently herewith]

Date: September 6, 2024
Time: 10:30 a.m.
Department: SSC-1

Complaint Filed: August 19, 2021
FAC Filed: October 4, 2022
Trial Date: None Set

DECLARATION OF JAMIE BRESSMAN

I, **Jamie Bressman**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Ross Aviation Operations, LLC (“Ross Aviation”) as an hourly-paid Line Service Tech from approximately June 2018 to approximately January 2021. I decided to seek legal advice about my work experiences with Ross Aviation and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Ross Aviation was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **8 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **13 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and, eventually, a PAGA representative.

3. I have spent over **20 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Ross Aviation, reviewing documents with my attorneys and answering their questions, and providing guidance regarding the duties of hourly-paid or non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Ross Aviation. I routinely checked in with my attorneys and their staff to make sure that they had all my most current information and any additional information that I had obtained.

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4. I was available to answer any questions my attorneys had, and was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **20 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Ross Aviation.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about **3 hours** reviewing the settlement agreement and about **3 hours** asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case, and as a class and PAGA representative, I respectfully request that the Court award me an Enhancement Payment in the amount of \$7,500.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

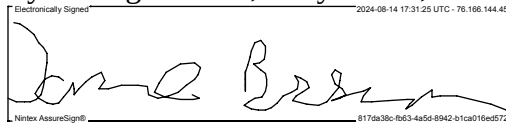
7. I am not related to anyone associated with Lawyers *for* Justice, PC.

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an Enhancement Payment, as well as my share of the settlement as a class member and aggrieved employee.

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

08/14/2024

Executed this ____ day of August 2024, at Lynwood, California.

Electronically Signed 2024-08-14 17:31:25 UTC - 76.166.144.45

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Jamie Bressman