Charles T. Sweeny (SBN 325167)
Raina Singer (SBN 323116)
SWEENY LAW, PC
8605 Santa Monica Blvd. # 618463
Los Angeles, CA 90069
Tel: (310) 658-2112

Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Ryan Slinger (SBN 351297)
Scarlet Tunney (SBN 359178)
LAWYERS *for* JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

GREGORY KNOP, individually, and on behalf of other members of the general public similarly situated,

Plaintiffs,

vs.

PEAK TECHNOLOGY ENTERPRISES, INC., a California corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No. 21CV376019
Consolidated for Settlement Approval Purposes with Case No. 21CV386575

Honorable Beth McGowen
Department 22

CLASS ACTION

DECLARATION OF CHARLES T. SWEENY IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT, ATTORNEYS' FEES AND COSTS, AND ENHANCEMENT PAYMENT

Date:	October 29, 2026
Time:	1:30 p.m.
Department:	22
Complaint Filed:	February 9, 2021
FAC Filed:	March 16, 2021
Trial Date:	None Set

DECLARATION OF CHARLES T. SWEENY

I, Charles T. Sweeny, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Sweeny Law, PC, who, along with Lawyers *for* Justice, PC, are attorneys of record for Plaintiff Gregory Knop ("Plaintiff"). The facts set forth in this declaration are within my personal knowledge or based on information and belief, and if called as a witness, I could and would competently testify thereto. Some of the facts described herein occurred prior to my law firm's association into this case, and my statements regarding those facts are based on the case file (which includes documents that were made in the regular course of business and which my law firm has a duty to maintain in true and correct form in the regular course of business) and/or documents that are a matter of public record.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On April 30, 2026, in Department 22 of the above-entitled Court, the Honorable Beth McGowen preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement and Release ("Settlement," "Agreement," or "Settlement Agreement,") entered into between Plaintiff and Defendant Peak Technology Enterprises, Inc., ("Defendant,") (together with Plaintiff referred to as the "Parties") and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiff Gregory Knop as the representative of the Class ("Class Representative"). The Court also provisionally appointed and designated Sweeny Law, PC and Lawyers *for* Justice, PC as counsel for the Class ("Class Counsel").

3. The Court approved and ordered the mailing of the Notice of Class Action Settlement ("Class Notice"), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed ILYM Group, Inc. ("ILYM Group") to serve as the third-party settlement administrator and handle the notice and settlement administration process.

4. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Costs, and Enhancement Payment ("Motion for Final Approval"), no Settlement Class Member has objected to the Class Settlement, the contemplated

request for Attorneys' Fees and Costs, Enhancement Payment, and Settlement Administration Costs, or the allocation for the PAGA Amount.

WORK PERFORMED BY CLASS COUNSEL

5. As outlined in the April 8, 2026 Declaration of Vartan Madoyan in support of Plaintiff's Motion for Preliminary Approval, Class Counsel conducted substantial prefiling investigations and engaged in extensive informal and formal discovery and further investigations in anticipation of mediation before reaching the Settlement.

6. Here, Class Counsel seek attorneys' fees in the amount of $105,000.00, which is thirty-five percent (35%) of the Gross Settlement Amount of $300,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-five percent (35%) of the recovery.

7. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing the consolidated cases; (2) the time, effort, and expense that Class Counsel dedicated to the cases; (3) the skill and determination that Class Counsel have shown; (4) the results that Class Counsel have achieved throughout the litigation; (5) the value of the settlement that Class Counsel have achieved in this matter; and (6) the other cases that Class Counsel have turned down in order to devote their time and efforts to these consolidated cases. The nature of the work performed, skill exercised, and the outcome in this matter which involves an outstanding monetary recovery involving a Gross Settlement Amount of $300,000.00 (with a Net Settlement Amount of approximately at least $116,721.70 to be paid to Settlement Class Members (with average Individual Settlement Payments estimated at $577.83), payment of $12,500.00 to PAGA Employees (with Individual PAGA Payment averaging approximately $95.42) and payment of $37,500.00 to the State of California)—support the percentage fee sought.

8. While not necessarily required to be demonstrated because a percentage fee is proper for this settlement, it should be noted that Class Counsel have incurred many hours of work in connection with prosecuting this matter such that the award of attorneys' fees is also justified under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC and Sweeny Law, PC have spent a collective total of **293.50 hours** (238.20 of which were spent by attorneys at Lawyers *for* Justice, PC, and **55.30**

of which were spent by me on behalf of Sweeny Law, PC) performing tasks and obtaining recovery in this matter. Attached hereto as **"EXHIBIT 1"** is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services I provided, and the time incurred in performing those services.

9. The work that I performed in this particular matter, the background of Sweeny Law, PC, as well as my individual background, training, and experience litigating complex wage-and-hour actions, and in particular, employment class action and representative action cases, support a reasonable hourly rate of compensation of at least $850 per hour for work that I performed.

EXPERIENCE AND ADEQUACY OF

SWEENY LAW, PC

10. I am the managing attorney of Sweeny Law, PC. I graduated from the University of San Francisco School of Law in May 2018 with a Juris Doctor degree. Prior to that I graduated from Loyola Marymount University with a Bachelor of Arts degree. From approximately June 2017 through August 2017, I served as a judicial intern to the Honorable Cathy L. Waldor of the United States District Court for the District of New Jersey. I am admitted to practice law before all courts of the State of California. I am also admitted to practice in the Northern, Central, and Eastern United States District Courts in California, as well as the United States District Court for the District of Columbia.

11. From September 2018 to approximately July 2020, I worked for the law firm Saveri & Saveri, Inc. in San Francisco, California, first as a law clerk and after passing the July 2018 bar exam, as an Associate Attorney. My practice at Saveri & Saveri was exclusively complex class actions and derivative securities actions. I played an integral role in researching, writing, and collecting evidence to successfully oppose dispositive motions in nationwide representative actions, including an opposition to a motion for summary judgment in In Re Domestic Airline Travel Antitrust Litigation, MDL Docket No. 2656, Misc. No. 15-1404 (CKK), an antitrust case in which, as of today's date, two of the four alleged conspirator airlines have agreed to settle for a total of 60 million dollars.

12. From August 2020 to May 2024, I was a Lead Litigation Attorney for the Law Firm

Lawyers for Justice, PC. My practice at Lawyers for Justice, PC focused on complex and contentious litigation in class actions and representative PAGA cases involving violations of the California Labor Code. During a relatively short time, I led a litigation team at Lawyers for Justice, PC that recovered millions of dollars on behalf of thousands of California employees.

13. As of today's date, I have taken and defended dozens of depositions, have briefed well over 100 motions, many of which required several rounds of briefing, and the vast majority of which I argued. These motions include contested motions for class certification, motions to compel discovery, motions to compel arbitration, demurrers, motions for summary judgment, motions for summary adjudication, *ex parte* applications for various relief, motions to remand, motions for reconsideration, petitions for coordination, and motions for consolidation, among many others. I have also briefed several appeals, none of which I have lost, either because the Courts of Appeal decided in my favor or because settlement was reached prior to a decision. I have litigated close to 300 putative class and/or representative actions under the California Private Attorneys General Act ("PAGA"). This includes working to obtain class certification through contested motion practice, as well as working with co-counsel preparing for trial and handling appeals in a certified class action with a class of over 2,000 individuals.

14. I have been appointed class counsel by way of contested motion for class certification. I have also been appointed class counsel by way of stipulation. Additionally, I have led litigation efforts for at least 60 putative representative wage and hour cases that settled on a class wide or statewide basis.

ENHANCEMENT PAYMENT TO PLAINTIFF

15. In recognition of his efforts and work spearheading the prosecution of this matter and serving as the Class Representative, as well as his broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 34(c) of the Settlement Agreement), the Settlement provides for an Enhancement Payment, in the amount of up to $7,500.00 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing his employment with Class Counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiff was available

whenever Class Counsel needed him and actively tried to obtain and provide information that would help obtain a recovery in this matter. Accordingly, it is appropriate for Plaintiff to receive $7,500.00 as a reasonable Enhancement Payment for his broader waiver and release of claims and services performed in this matter, in addition to his individual settlement payment(s).

16. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiff, the Class, and the State of California.

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

Executed this 7th day of October 2026, at Los Angeles, California.



Charles T. Sweeny

EXHIBIT 1

Task	Time
Investigation and Research / Due Diligence	
Communicate with Co-Counsel Lawyers for Justice, PC ("Co-Counsel") during the Case	4.40
Meet, Communicate, and/or Review Communication with Plaintiff Gregory Knop ("Plaintiff")	2.30
Pleadings and Court Filings	
Draft, Review, and/or Revise Notice of Association of Counsel (Class Action) (filed on August 16, 2024)	0.20
Draft, Review, and/or Revise Notice of Association of Counsel (PAGA Action) (filed on August 16, 2024)	0.20
Meet and Confer with Defendant's Counsel and Draft, Review, and/or Revise Joint Complex Statement Case Management Conference (Class Action) (filed on November 1, 2024)	0.60
Review Notice of Change of Address or Other Contact Information (Class Action) (filed on January 23, 2025)	0.10
Review Notice of Change of Address or Other Contact (PAGA Action) (filed on January 24, 2025)	0.10
Meet and Confer with Defendant's Counsel and Co-Counsel, and Draft, Review, and/or Revise Plaintiff's Complex Case Management Conference Statement (Class Action) (filed on February 24, 2025)	1.10
Review Court's Notice of Reset Hearing (Class Action) (filed on February 26, 2025)	0.10
Review Court's Notice of Reset Hearing (Class Action) (filed on June 3, 2025)	0.10
Meet and Confer with Defendant's Counsel and Co-Counsel, and Draft, Review, and/or Revise Plaintiff's Complex Case Management Conference Statement (Class Action) (filed on July 11, 2025)	0.80

Review Court's Notice of Reset Hearing (Class Action) (filed on July 15, 2025)	0.10
Meet and Confer with Defendant's Counsel and Draft, Review, and/or Revise Joint Complex Statement Case Management Conference (Class Action) (filed on September 25, 2024)	1.00
Review Court's Notice of Reset Hearing (Class Action) (filed on October 2, 2025)	0.10
Meet and Confer with Defendant's Counsel and Draft, Review, and/or Revise Joint Complex Statement Case Management Conference (Class Action) (filed on December 15, 2024)	1.20
Draft, Review, and/or Revise Notice of Ruling From December 18, 2025 Case Management Conference	1.00
Court Appearances	
Prepare for and Remotely Attend Case Management Conference (December 18, 2025)	0.90
Prepare for and Remotely Attend Hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement (April 30, 2026)	1.90
Settlement	
Draft, Review, Revise, Negotiate, and Finalize Memorandum of Understanding (executed on August 30, 2024)	2.20
Draft, Review, Revise, Negotiate, and Finalize Joint Stipulation of Class Action Settlement and Release (executed on January 15, 2026), and Draft, Review, and/or Revise Notice of Class Action Settlement	5.40
Draft, Review, and/or Revise Correspondence to, and Respond to Correspondence from, Settlement Administrators, including obtaining competitive bids therefrom.	2.60
Law and Motion	
Research, Draft, and Revise Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Charles T. Sweeny, Declaration of Vartan Madoyan, Declaration of Plaintiff Gregory Knop, and [Proposed] Order Granting Preliminary Approval of Class Action Settlement (filed on April 8, 2026)	14.60

Draft and Revise Supplemental Declaration of Charles T. Sweeny ISO Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on April 9, 2026)	1.00
Review Tentative Ruling on Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement and Confer with Co-Counsel and Defendant's Counsel re: same, per Court's Directive in Tentative Ruling (published on April 29, 2026)	2.60
Review Court's Order Granting Motion for Preliminary Approval (April 30, 2026)	0.30
Research, Draft, and Revise Plaintiff's Notice of Motion and Motion for Final Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Nicole Bench on behalf of ILYM Group, Declaration of Charles T. Sweeny, Declaration of Ryan Slinger, and [Proposed] Final Approval Order and Judgment (filed on October 7, 2026)	10.40
Total Hours:	55.30