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**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;

Plaintiff,

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. 21CV38657*

Honorable Charles F. Adams
Department 7

CLASS ACTION

**DECLARATION OF PLAINTIFF
GREGORY KNOP IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT AND RELEASE**

Date: April 30, 2026
Time: 1:30 p.m.
Department: 7
Reservation ID: Set by Court Order
Complaint Filed: February 9, 2021
FAC Filed: March 16, 2021
Trial Date: None Set

DECLARATION OF GREGORY KNOP

I, Gregory Knop, 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 cases, which I understand have been consolidated for settlement purposes. 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 Defendant Peak Technology Enterprises, Inc. (“Defendant”) from approximately August 2019 to approximately November 2020, as a Mechanical Inspector III, which is a position that is paid on hourly, non-exempt basis. I decided to seek legal advice about my work experiences with Defendant 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 Defendant was held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC 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 a PAGA representative. Prior to commencing the cases, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the lawsuits, I have spent time speaking with my attorneys regarding my cases and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had my most current information and any additional information that I had obtained.

1 4. Throughout my cases, I was available to answer any questions my attorneys had,
2 and available to speak and meet with my attorneys whenever they needed me. I responded to them
3 as quickly as possible and gave them as much information and identified as many documents as I
4 could. I spent time speaking with my attorneys about the cases, identifying potential witnesses,
5 providing my attorneys with documents and information concerning the cases, and describing
6 policies, practices, and procedures of Defendant.

7 5. As far as the settlement is concerned, I was available to review documents and
8 answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the
9 Settlement Agreement and discussed the questions I had regarding the potential settlement with
10 my attorneys before signing the settlement papers.

11 6. I understand that a settlement has been reached in my case and what my duties and
12 responsibilities are as a class and PAGA representative. For example, I am aware that if the
13 settlement is granted preliminary approval, the Court will certify a class for settlement purposes
14 and likely appoint me as the representative of the class and my attorneys as counsel for the class.
15 I also understand that my duties will include checking in on, monitoring, and conferring with my
16 attorneys to facilitate the notice and settlement administration process, and to provide information
17 that the Court needs in order to assess whether the settlement is fair, reasonable, and adequate.
18 Further, if any individuals who are potential class members contact me, I will take steps to have
19 them referred to the Court-appointed settlement administrator so that these individuals may receive
20 the necessary information and notice they may be eligible to receive in connection with the
21 settlement and contemplated final approval hearing.

22 7. I believe that I have done everything that my attorneys have asked of me and have
23 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class
24 members and the State of California with respect to aggrieved employees. I have volunteered to
25 represent and champion the interests of many other people with similar claims and injuries because
26 of the importance of the case and the necessity that all class members and aggrieved employees
27 benefit from the lawsuits equally. I understand that as a proposed class representative, and if
28 formally appointed as a class representative, I have and continue to represent the interests of all

1 members of the class in litigation to recover relief for the class. As one of Defendant's hourly-paid
2 employees who was subject to the same policies, practices, and procedures as the other members
3 of the class, I have claims that are typical of those of the class. I consider the interests of the class
4 just as I would consider my own interests. I understand that I may need to put the interests of the
5 class before my own interests, although I have no reason to believe that my interests conflict with
6 the interests of the class. I understand that any resolution of the lawsuit is subject to court approval
7 and must be in the best interest of the class. I have participated, and continue to participate, in the
8 lawsuit as necessary. I have actively followed and monitored the progress of the lawsuits and have
9 taken steps to make sure that the litigation is prosecuted by the skilled and effective attorneys that
10 I have retained.

11 8. I think my efforts helped to get the result obtained in this matter, and as a potential
12 class and PAGA representative, I respectfully request that the Court award me an enhancement
13 award for my efforts in pursuing and participating in this matter, as well as my broader release of
14 claims. Taking into consideration the time that I have dedicated to this matter, I believe that this
15 amount is reasonable.

16 9. I am not related to anyone associated with Lawyers *for* Justice, PC or Sweeny Law,
17 PC.

18 10. I have not entered into any undisclosed agreements, nor have I received any
19 undisclosed compensation in this matter. The only compensation I will receive is whatever amount
20 the Court awards as an Enhancement Payment, as well as my Individual Settlement Share as a
21 Class Member and PAGA Employee.

22 11. My attorneys have agreed to split fees awarded by the Court or generated as a result
23 of this case, and I have given written consent to that split.

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

26 Executed this 8th day of April 2026.

27 

Gregory Knop (Apr 8, 2026 11:18:40 CDT)

Gregory Knop