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Attorneys for Plaintiff ELIA REZKALLA, in a Representative capacity only, and on behalf of other members of the public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

ELIA REZKALLA, Individually, and on
behalf of other members of the general public
similarly situated,

Plaintiff,

v.

CORECIVIC, INC., a Maryland Corporation;
and CORECIVIC OF TENNESSEE, LLC, a
Tennessee Limited Liability Company, and
DOES 1-10, inclusive.

Defendants

CASE NO. 37-2021-00045841-CU-OE-CTL

CLASS ACTION

**MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF
PLAINTIFF'S UNOPPOSED MOTION FOR
FINAL APPROVAL OF (1) CLASS
ACTION SETTLEMENT; (2)
ATTORNEYS' FEES AND COSTS; and (3)
CLASS REPRESENTATIVE AWARD**

Date: June 30, 2023

Time: 1:30 p.m.

Dept: C-72

Judge: Hon. Timothy Taylor

1 I, Elia Rezkalla, hereby declare as follows:

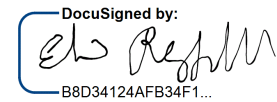
- 2 1. I am the named Plaintiff in the above-captioned matter. I make this declaration in support of
3 Plaintiff's Unopposed Motion for Final Approval of Class Action Settlement, Attorneys Fees
4 and Costs, and Class Representative Award.
- 5 2. I am personally familiar with the facts set forth in this declaration, and if called to testify as a
6 witness I could and would do so.
- 7 3. To my recollection, I personally met with my Attorneys on at least 7 occasions. Several of
8 those meetings lasted in excess of 2 hours.
- 9 4. During these meetings, I would review and explain numerous documents turned over by
10 Defendants from my employment. I would also explain my (as well as others') role during
11 work. I also helped identify numerous other employees who could support the claims I was
12 making in this lawsuit. I contacted many of these individuals myself to verify their willingness
13 to participate.
- 14 5. I also spoke with my attorneys on the phone on at least 15 other occasions.
- 15 6. While it did not occur, I did agree to have my deposition taken. In preparation for a possible
16 deposition, I spent several hours preparing with my attorneys. I also spent significant time
17 reviewing the settlement documentation and discussing the settlement with my attorneys.
- 18 7. In total, I estimate that I spent at least 45 hours related to the above mentioned tasks directly
19 working with my attorneys. I also spent at least another 8-10 hours of my own time gathering
20 evidence and outlining issues that I later shared with my attorneys.
- 21 8. When I decided to move forward with this case, I was counseled by my attorneys of the
22 potential stigma of being a Class Representative in a class action dispute, as this is a publicly
23 filed lawsuit.
- 24 9. I was also advised when I brought this case that had we lost, I could have been personally
25 liable for paying all of Defendants' costs. I was further advised this could be well into the tens
26 of thousands of dollars on this type of case.

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28 ///

10. Despite these risks I was committed to achieving a settlement that would benefit all employees working for Core Civic.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this ^{6/7/2023} _____ day of June, 2023 at San Diego, California.

DocuSigned by:

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ELIA REZKALLA