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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF HUMBOLDT**

KENNETH GUNTHER, 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.

NORTH COAST COOPERATIVE, INC., a
California corporation; NORTH COAST
COOP, an unknown business entity; and DOES
1 through 100, inclusive,

Defendants.

Case No. CV2000307

Honorable Timothy A. Canning
Department 4

CLASS ACTION

**DECLARATION OF KENNETH
GUNTHER IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Jeremy Stern); and [Proposed]
Order filed concurrently herewith]

Date: April 24, 2024
Time: 10:30 a.m.
Department: 4

Complaint Filed: February 25, 2020
FAC Filed: April 26, 2022
Trial Date: None Set

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1 additional hours speaking with my attorneys about the case, identifying potential witnesses,
2 providing my attorneys with documents and information concerning the case, and also describing
3 policies, practices, and procedures of North Coast. During the discovery phase of the litigation, I
4 spent approximately 10 hours reviewing North Coast's discovery requests, locating documents,
5 and providing documents and responses to my attorneys.

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

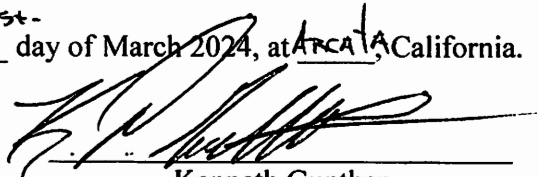
10 6. I believe that I have done everything that my attorneys have asked of me and have
11 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
12 and the State of California. I think my efforts helped to get the result obtained in this case, and as
13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

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

17 8. I have not entered into any undisclosed agreements, nor have I received any
18 undisclosed compensation in this case. The only compensation I will receive is whatever amount
19 the Court awards as an enhancement award as well as my share of the settlement as a class
20 member.

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

23 Executed this 21st day of March 2024, at Arca, California.

24 
25 Kenneth Gunther