

JULIAN HAMMOND (SBN 268489)
jhammond@hammondlawpc.com
ADRIAN BARNES (SBN 253131)
abarnes@hammondlawpc.com
POLINA BRANDLER (SBN 269086)
pbrandler@hammondlawpc.com
ARI CHERNIAK (SBN 290071)
acherniak@hammondlawpc.com
HAMMONDLAW, P.C.
1201 Pacific Ave. Suite 600
Tacoma WA 98402
(310) 807-1666
(310) 295-2385 (Fax)

Attorneys for Plaintiffs and the Putative Classes

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

ADAM FLIGSTEN and JONATHAN WANG,
individually and on behalf of all others similarly
situated,

Plaintiffs,

vs.

MUSICIANS INSTITUTE, INC., a California
Corporation,

Defendant.

CASE NO. 21STCV38365

**DECLARATION OF ADAM FLIGSTEN IN
SUPPORT OF PLAINTIFFS' MOTION
FOR ORDER GRANTING PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: September 1, 2023
Time: 11:00 a.m.
Dept 6

1 I, Adam Fligsten, declare as follows:

2 1. I am a named Plaintiff and putative Class Representative in this matter. I am over 18 years
3 of age. I have personal knowledge of the following facts and could and would testify competently to
4 them.

5 2. I have been employed as an instructor by Musicians Institute since 2013.

6 3. I first discussed this lawsuit with my attorneys at HammondLaw, P.C. in August 2021.
7 Thereafter, I decided to proceed with my lawsuit against because I wanted to ensure that my fellow
8 employees were afforded the protections of the Labor Code to which they are entitled.

9 4. At the time I decided to proceed with my lawsuit, my attorney explained to me what
10 acting as a Class representative would entail. I understood then, and now, that a Class representative has
11 a duty to look out for and protect the interests of the class as whole, and to put the interests of the class
12 ahead of their own interests.

13 5. I am committed to representing the interests of the class. I do not believe, nor do I have
14 any reason to believe, that my interests are in conflict with or in any way antagonistic to the interests of
15 the Class or the proposed Settlement Administrator, ILYM.

16 Dated: 7/28/2023

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18 *Adam Fligsten*

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20 ADAM FLIGSTEN
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