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ABRAMSON LABOR GROUP

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Attorneys for Plaintiff and the proposed class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF CONTRA COSTA

GILDARDO MOTA STEVENS, an
individual, on behalf of himself and others
similarly situated,

PLAINTIFF,

v.

PURPLE EAGLE LLC; and DOES 1 thru 50,
inclusive,

DEFENDANTS.

CASE NO. MSC21-02204

[Case Assigned for All Purposes to Hon.
Charles S. Treat in Dept. 12]

**DECLARATION OF WILLIAM ZEV
ABRAMSON IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: October 19, 2023

Time: 9:00 a.m.

Dept.: 12

Complaint Filed: October 26, 2021

Trial Date: None Set

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1. I am an attorney duly licensed to practice law in the State of California and am a member in good standing with the State Bar of California. I am co-counsel in the class action representing named Plaintiff GILDARDO MOTA STEVENS and have personal knowledge of the facts thereto. If called as a witness, I could and would competently testify herein.

3. My office has represented thousands of aggrieved employees throughout the entire state of California helping them pursue justice for their employment claims.

5. I have been actively participating in the prosecution and successful settlement of multiple wage and hour class action lawsuits, helping to recover wages and penalties on behalf of tens of thousands of class members.

7. Although I am experienced in employment and class action matters, I associated in as co-counsel on this case with Kingsley & Kingsley, who has a great deal of experience in wage and hour class action employment cases, and together our firms have and will continue to aggressively and competently represent the named plaintiff and putative class members in this case.

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1 and fully support the proposed Settlement.

2 9. The Abramson Labor Group and the Kingsley & Kingsley firms have a written
3 co-counsel agreement, acknowledged by Plaintiff, that provides the two firms will split
4 evenly any fee recovery awarded by the Court. The fee-sharing arrangement will not
5 diminish the payments to Plaintiff and class members.

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

8 This Declaration was executed this 15th day of September, 2023, in Los Angeles,
9 California.

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11 _____
William Zev Abramson

(PROOF OF SERVICE)

[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On September 27, 2023, I served all interested parties in this action the following documents described as: **DECLARATION OF WILLIAM ZEV ABRAMSON IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Ann K. Smith
Sarkis A. Atoyan
**ATKINSON, ANDELSON,
LOYA, RUUD & ROMO**
12800 Center Court Driver South, Suite 300
Cerritos, CA 90703-9364
Sarkis.atoyan@aalrr.com
asmith@aalrr.com

ABRAMSON LABOR GROUP
William Zev Abramson
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☐ **(BY MAIL)** I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage fully prepaid at Encino, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒ **BY ELECTRONIC SERVICE:** I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

☒ **BY ELECTRONIC MAIL TRANSMISSION:** I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 27, 2023, at Encino, California.



Michelle Tanzer