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Attorneys for Plaintiffs

Rachel Gillett and Derek Brumbaugh

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

Tina Lundin, individually, and on behalf
of other members of the general public
similarly situated; Derek Brumbaugh,
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;

Plaintiffs,

vs.

Anaheim Transportation Network DBA
Anaheim Resort Transportation, a
California corporation; and DOES 1-50,
inclusive,

Defendants.

Case No.: 30-2021-01204870-CU-OE-CXC

Honorable Randall J. Sherman
Department CX-105

**DECLARATION OF TINA LUNDIN IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL**

[Plaintiffs' Unopposed Motion for Preliminary
Approval of Class Action Settlement;
Declaration of Proposed Class Counsel
(Danielle L. GruppChang); Declaration of
Derek Brumbaugh; and [Proposed] Order filed
concurrently herewith]

Reservation No: 74290989

Date: August 2, 2024

Time: 10:00 a.m.

Department: CX-105

Complaint Filed: June 4, 2021

FAC Filed: March 28, 2024

Trial Date: None Set

DECLARATION OF TINA LUNDIN

I, Tina Lundin, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiff in the above-captioned case, and 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 Anaheim Transportation Network which does business as Anaheim Resort Transportation ("ATN") from approximately May 2016 to approximately March 2020 in multiple non-exempt, hourly-paid positions such as fueler, maintenance employee, and driver. I had concerns regarding ATN's wage and hour policies for its employees, including myself, so I spent about 5 hours researching California employment laws and looking for the right employment law firm. I spoke to Danielle GruppChang at Brock & Gonzales, LLP and spoke to her for approximately 5 hours about my experiences at ATN, the applicable California laws, and what to expect during a potential case. Based on our conversation, I decided to retain Brock & Gonzales, LLP to help me file a lawsuit against ATN on behalf of the other employees that I believe were not treated fairly or paid all of their earned wages by ATN.

3. After retaining Brock & Gonzales, LLP, I spent about 9 hours discussing the details of my experiences working at ATN, the other theories involved in a potential lawsuit, class action lawsuits, and what my responsibilities would be as a named plaintiff.

4. After the lawsuit was filed, I estimate I spent at least 17 hours communicating with my attorneys. I regularly contacted and called my attorneys to get updates and provide any additional information I had obtained. I also made myself available to answer texts and emails and to have meetings with my attorneys. I answered all of my attorneys' questions about ATN to the best of my ability and did my best to seek out the information if I did not know the answer. I thought deeply about my experiences at ATN and provided relevant information about other non-exempt, hourly-paid employees, including but not limited to their departments, job titles, and job duties, wage and hour policies which effected all hourly-paid employees, and what I had personally witnessed other employees experience at work. I spent at least 5 hours on my own

1 looking for additional documents and gathering information to provide to my attorneys about
2 ATN. During the discovery phase, I spent approximately 5 hours reviewing ATN's discovery
3 requests, looking for responsive documents and gathered information, and reviewing the
4 responses my attorney drafted prior to signing the finalized copies.

5 5. I made myself available all day on the day of the mediation and spent about 4
6 hours beforehand discussing what a potential settlement of the action would entail with my
7 attorneys. I spent about 6 hours reviewing the settlement agreement and about 5 hours asking
8 questions and discussing the potential settlement with my attorneys before signing the settlement
9 agreement.

10 6. I answered all of my attorneys' questions as well as I could, provided them with
11 all of the relevant information I had as well as all of the documentation I could gather, researched
12 each aspect of the lawsuit to the best of my ability, and did everything else my attorneys asked of
13 me. I believe I did everything I could to get a fair result for the other employees. I think
14 everything I did helped to get the result obtained in this case.

15 7. I respectfully request that the Court approve and award me a Class Representative
16 Service Payment in the amount of \$8,500.00 for my efforts and active participation in the case.
17 Taking into consideration the time that I dedicated to this case, I believe that this amount is
18 reasonable.

19 8. I am not related to anyone associated with Brock & Gonzales, LLP.

20 9. I have not entered into any undisclosed agreements or received any undisclosed
21 compensation in this case.

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

24 Executed on 16/04/2024, at Saugus, California.

25
26 
Tina Lundin (Apr 16, 2024 15:56 PDT)

Tina Lundin