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Attorneys for Plaintiff Aaron Coffey

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

AARON COFFEY, individually and on behalf of
others similarly situated, and as an aggrieved
employee and Private Attorney General,

Plaintiff,

vs.

CATALINA CHANNEL EXPRESS, INC., a
California corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 21STCV41396

Honorable Stuart M. Rice
Department 1

**DECLARATION OF PLAINTIFF AARON
COFFEY IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: November 13, 2024
Time: 10:30 a.m.
Dept: 1

Complaint Filed: November 10, 2021
FAC Filed: March 29, 2022
Trial Date: Not Set

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1 6. I understood that in the event this matter did not settle and proceeded with trial, I would
2 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
3 responsibilities that are necessary for this lawsuit.

4 7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
5 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
6 also understood there was a risk of losing my current job and/or income out of retaliation or due to the
7 time that I would have to miss work in order to fulfill my duties and responsibilities in this matter,
8 including having to attend the trial, if needed. Most importantly, I believe that by pursuing this case,
9 I have taken a significant risk because future employers can easily find out that I sued my prior
10 employer, and that may negatively impact my ability to find employment within this industry – and
11 even outside of it – in the future. In contrast, the other employees who will be receiving money from
12 this lawsuit did not have to file a claim or take the risk that I took in bringing this action.

13 8. I reviewed the settlement agreement, discussed the settlement agreement with my
14 attorneys, and asked them questions before signing it.

15 9. I believe that I have done everything that my attorneys have asked of me and tried, to
16 the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California.
17 In total, I have spent approximately 30 to 35 hours participating in this case as described above. I
18 believe my efforts helped get the result obtained in this case.

19 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
20 approval, and any settlement must be designed in the best interest of the Class as a whole. At all times
21 throughout the course of this litigation I have considered the interests of the Class and put them before
22 my own personal interests.

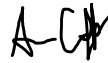
23 11. I understand that incentive or enhancement awards are discretionary and intended to
24 compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and
25 other employees; the financial and/or reputational risk undertaken in bringing the class and/or PAGA
26 action, and an acknowledgment of the benefits resulting from the representative's actions. I believe
27 my work in this matter is meritorious on these points for the reasons set forth above.

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1 12. I respectfully request that the Court approve and award me an Enhancement Payment
2 in the amount of \$5,000.00 for my efforts and active participation in the case and for the broader,
3 general release of all claims that I have or may have against Defendant in connection with the
4 settlement. Taking into consideration the time that I dedicated to this case, I believe that this amount
5 is reasonable.

6 13. I am not related to anyone associated with Blackstone Law, APC.

7 I declare under penalty of perjury under the laws of the State of California that the foregoing
8 is true and correct. Executed on 04/29/2024, at Bellflower, California.

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