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10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**

11 **COUNTY OF LOS ANGELES**

12 **CADYN CATHERS**, individually and on behalf
13 of himself all others similarly situated,

14 Plaintiff,

15 vs.

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17 **MOUNT SAINT MARY'S UNIVERSITY**, a
California Non-Profit Corporation,

18 Defendant.
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CASE NO. 22STCV02941

**DECLARATION OF CADYN CATHERS IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT
AGREEMENT AND CLASS NOTICE**

Date: October 17, 2023

Time: 10:00 a.m.

Dept. 7

1 I, Cadyn Cathers, 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 was employed by Mount Saint Mary's University as an adjunct instructor from August
6 2016 through to the end of 2021.

7 3. I first discussed this lawsuit with my attorneys at HammondLaw, P.C. in December 2021.
8 Thereafter, I decided to proceed with my lawsuit against Mount Saint Mary's University because I
9 wanted to ensure that my fellow employees were afforded the protections of the Labor Code to which
10 they are entitled.

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

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

18 I declare under penalty of perjury under the laws of the United States and the State of California that the
19 foregoing is true and correct. Executed on 6/30/2023.

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21 CADYN CATHERS