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SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

VIKRAM PETERS, individually and on behalf
of all others similarly situated,

Plaintiff,

vs.

LIFE PACIFIC UNIVERSITY, a California
Non-Profit Corporation,

Defendant.

CASE NO. 22STCV06988

**DECLARATION OF VIKRAM PETERS IN
SUPPORT OF PLAINTIFF'S MOTION FOR
ORDER GRANTING PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: July 13, 2023
Time: 10:00 a.m.
Dept. 9

I, Vikram Peters, declare as follows:

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

2. I was employed as an Adjunct Instructor by Life Pacific University from 2015 until 2021.

3. I first discussed this lawsuit with my attorneys at HammondLaw in January 2022. Thereafter, I decided to proceed with my complaint against Life Pacific because I wanted to ensure that my fellow employees were afforded the protections of the Labor Code to which they are entitled.

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

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

6. Aside from my fiduciary duties as a class representative, I also understand that as the PAGA representative, I stand in the shoes of the State of California in seeking PAGA penalties for the alleged Labor Code violations.

7. I understand the nature of the Settlement and the deductions and allocations set forth in the Settlement Agreement, and believe that Settlement Agreement is fair and reasonable to the members of the Class, especially in light of the risk factors of proceeding with litigation.

8. As part of the Settlement Agreement, I have entered into a general release of all my claims against Defendant which is significantly broader than the release being given by the members of the Class. This case also involved risks for me, including the risk of putting my name on a lawsuit, which might gain me a reputation that would make it harder for me to find employment in the industry in which I work. Others were afraid to bring forth the claims that I brought in this case, but I disregarded those fears and proceeded to bring this Class Action. Disregarding the significant risks, both financial and reputational, I pursued this case on behalf of the Class to a successful resolution and settlement.

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1 9. I also do not believe, nor do I have any reason to believe, that my interests are in conflict
2 with, or in any way antagonistic to, the interests of the Settlement Administrator or the proposed *cy pres*
3 beneficiary, Christian Legal Aid of Los Angeles.

4 I declare under penalty of perjury under the laws of the State of California that the foregoing is
5 true and correct. Executed on 3/6/2023.

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9 VIKRAM PETERS
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DECLARATION OF VIKRAM PETERS ISO PRELIMINARY APPROVAL