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Attorneys for Plaintiff and the Settlement Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

BRYAN HICKS, 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,

Plaintiff,

vs.

CALIFORNIA WATER SERVICE, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 21CV376394

Honorable Charles F. Adams
Department 7

CLASS ACTION

**DECLARATION OF BRYAN HICKS IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND CLASS
REPRESENTATIVE ENHANCEMENT
PAYMENT**

[Plaintiff's Motion for Final Approval of Class
Action Settlement, Attorneys' Fees and Costs,
and Class Representative Enhancement
Payment; Declaration of Class Counsel (Joanna
Ghosh); Declaration of Settlement
Administrator (Kevin Lee); and [Proposed]
Final Approval Order and Judgment filed
concurrently herewith]

Date: March 21, 2024
Time: 1:30 p.m.
Department: 7

Complaint Filed: February 23, 2021
FAC Filed: February 24, 2023
Trial Date: None Set

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1 spent at least 8 additional hours speaking with my attorneys about the case, identifying potential
2 witnesses, providing my attorneys with documents and information concerning the case, and also
3 describing policies, practices, and procedures of Cal Water.

4 5. On January 17, 2022, I attended a full day of deposition that lasted approximately
5 6 hours. I spent at least 3 hours preparing for the deposition. After the deposition, I spent at least
6 2 hours reviewing my testimony and discussing the contents of the deposition transcript with my
7 attorneys.

8 6. As far as the settlement is concerned, I was available to review documents and
9 answer any questions my attorneys had. I spent about 3 hours reviewing the settlement
10 agreement and about 3 hours asking questions and discussing the potential settlement with my
11 attorneys before signing the settlement agreement.

12 7. I believe that I have done everything that my attorneys have asked of me and have
13 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
14 and the State of California. I think my efforts helped to get the result obtained in this case, and
15 as a class and PAGA representative, I respectfully request that the Court award me a class
16 representative enhancement payment in the amount of \$8,000.00 for my active participation in
17 this case. Taking into consideration the time that I have dedicated to this case, I believe that this
18 amount is reasonable.

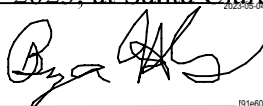
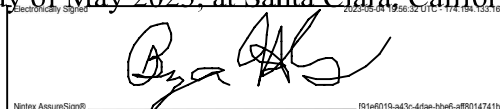
19 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

20 9. I have not entered into any undisclosed agreements, nor have I received any
21 undisclosed compensation in this case. The only compensation I will receive is whatever amount
22 the Court awards as a class representative enhancement payment, as well as my share of the
23 settlement as a class member and as an aggrieved employee.

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

05/04/2023

26 Executed this ____ day of May 2023, at Santa Clara, California.

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Bryan Hicks