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

KAMLESH KRISHNA, as an individual
and on behalf of all others similarly
situated,

Plaintiffs,

v.

CEPHEID, a Corporation; and DOES 1
through 50, inclusive,

Defendants.

CASE NO. 22CV397316

[Assigned for all purposes to the Hon. Charles F.
Adams, Dept. 7]

**DECLARATION OF EDWARD W. CHOI IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: July 18, 2024

Time: 1:30 P.M.

Dept.: 7

Complaint Filed: April 26, 2022

FAC Filed: June 29, 2022

SAC Filed: January 5, 2023

Trial Date: None Set

ADDITIONAL COUNSEL FOR PLAINTIFF

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DECLARATION OF EDWARD W. CHOI

I, Edward W. Choi, declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am with the Law Offices Of Choi & Associates, counsel of record for Kamlesh Krishna and Rex Servania ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. From the inception of the case, Class Counsel has zealously represented the interests of the Class. Class Counsel exchanged written discovery and engaged in significant meet and confer discussions with opposing counsel to obtain informal data and documents on behalf of the Class. This settlement was obtained for the benefit of the Class, as opposed to the individual Class Representative.

3. I am one of the primary attorneys on this matter. My qualifications are as follows: I received my Juris Doctorate degree from UCLA Law School in 2000. Upon graduation, I joined the law firm of Lee & Associates in Los Angeles, California as an associate. I started my own practice in October 2004.

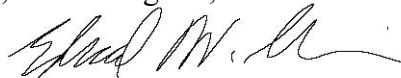
4. During the course of my practice, I have primarily represented consumers and obtained millions of dollars in recovery for my clients. I have handled numerous wage and hour cases during my career. Since 2009, I have been certified as class counsel and granted final approval in numerous wage and hour cases including, but not limited to, *Choi, et al. v. Midway International Inc.*, et al. LASC Case No. BC394495; *Garcia, et al. v. RGIS, LLC, et al.* LASC Case No. BC 425624; *Cabrera v. Frazee, et al.* LASC Case No. BC 440309; *Vo, et al. v. The Party Staff, et al.* OCSC Case No. 30-2011-00444836-CU-OE-CXC; *Oh, et al. v. Best Coach Technologies, Inc., et al.* LASC Case No. BC 462848; *Rawley v. Freedom Mortgage, Inc.* Orange County Superior Court Case No. 30-2014-00724164-CU-OE-CXC; *Castro v. Continental Airlines*, USDC Central District Case No. 2:14-CV-00169-SVW-AGR; *Barreras v. Michaels Stores, Inc.* USDC – Northern District Case No. C12-04474 PJH, *Dynabursky v. AlliedBarton Security Services, LP, et al.*, SACV 12-02210 JST (RNBx), *Brown v. CVS Caremark, et al.* United States District Court, Central District, Case No.: 2:15-cv-07631-JFWPJW; *Castillo v. Sheraton Operating*

1 *Corporation*, USDC, Central District of California Case No. 2:17-cv-07091-FMO-AS; *Zepeda v.*
2 *Ulta Salon, Cosmetics & Fragrance, Inc.* USDC, Eastern District of CA, Case No. 1:18-cv-00750-
3 DAD; *Audycki v. Stanford Health Care, Inc.* Santa Clara Superior Court, Case No. 19CV347173 and
4 *Medina v. United Airlines, Inc.* Los Angeles Superior Court, Case No. BC 624742.

5 8. I support the settlement as fair, reasonable and adequate, and in the best interest of the
6 Class Members as a whole. Each side has apprised the other of their respective factual contentions,
7 legal theories and defenses, resulting in extensive arms' length negotiations taking place among the
8 Parties. Although, Plaintiff's attorneys are certain that they can prevail on class certification, as well
9 as on the merits, they recognize the inherent risks in drawn-out litigation, including that Plaintiff
10 could fail to establish liability. Based on their own independent investigation and evaluation, the
11 Parties and their respective counsel are of the opinion that the Settlement for the consideration and
12 on the terms set forth in the Class Action Settlement Agreement are fair, reasonable, and adequate
13 and the settlement is in the best interests of the Class and Defendant in light of all known
14 circumstances and the expenses and risks inherent in litigation.

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

17 Executed on this 24th day of June 2024, at Los Angeles, California.

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