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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN MATEO**

HARRISON BOMTEMPO, 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 Act;

Plaintiff,

vs.

K1 SPEED, INC., a Delaware corporation; and
DOES 1 through 100, inclusive,

Defendant.

Case No. 22-CIV-03134

Honorable Nicole S. Healy
Department 28

CLASS ACTION

**DECLARATION OF HARRISON
BOMTEMPO IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date:
Time:
Department: 28

Complaint Filed: August 2, 2022
FAC Filed: June 28, 2024
Trial Date: None Set

DECLARATION OF HARRISON BOMTEMPO

I, **Harrison Bomtempo**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by K1 Speed, Inc. as an hourly-paid Track Operator from September 2021 to November 2021. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant paid me and other employees what was owed to us and was held accountable for its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **5 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **2 hours** discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff, class representative and eventually a PAGA representative.

3. I have spent over **8 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a named plaintiff, class representative, and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, providing guidance regarding the duties of hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. Throughout my involvement in this case, I was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **5 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendant.

