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Attorneys for Plaintiff and on behalf of the Proposed Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

EDWARD CRUZ, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

C T CORPORATION SYSTEM., a
Delaware Corporation; and DOES 1
through 20, inclusive;

Defendants.

Case No.: 30-2022-01261966-CU-OE-CXC
*[Assigned to Hon. Melissa McCormick, Dept
CX104, for all purposes]*

**DECLARATION OF PLAINTIFF EDWARD
CRUZ IN SUPPORT OF MOTION FOR
FINAL APPROVAL**

Hearing

Date: March 14, 2024

Time: 2:00 p.m.

Dept: CX104

I, Edward Cruz, state and declare:

1. I am the Plaintiff in the above captioned action and have personal knowledge of all matters stated herein and could competently testify thereto. I make this declaration in support of the motion for final approval of the class action settlement. I believe that the settlement is fair and reasonable and constitutes a fair resolution of the claims alleged.

2. During my employment with CT Corp, there were several issues that concerned me and which I thought did not comply with California law, such as not being paid properly and not getting proper meal periods and rest breaks. Even though I was unsure if I wanted to bring a

lawsuit because of the risk of stepping forward as a whistle blower (since this could jeopardize my livelihood in the industry and make it difficult to find future jobs), I retained Lauby, Mankin & Lauby LLP to proceed with this class action because I did not think that myself or the other employees were being treated correctly.

3. When I first retained my attorneys and chose to pursue this case on a class action basis, I understood that I had specific burdens as the “Class Representative,” which included: (a) representing the interests of all class members, (2) considering the interests of all class members above my own personal interests, (3) participating actively in the lawsuit, including potential testimony at deposition and trial, and keeping generally aware of the status and progress of the lawsuit. Moreover, I understood that any resolution of the lawsuit is subject to court approval and must be designed in the best interests of the class as a whole.

4. I respectfully request that the court approve the service award for the following reasons.

5. First, I have spent substantial time working on this case and have performed substantial services for the Class to help obtain a highly beneficial settlement for my fellow employees. Since first initiating this action, I estimate that I have spent at least sixty (60) hours engaged in activities to benefit the class. I have assisted my attorneys in numerous ways, including helping to explain and discuss the company’s practices and their general practices and procedures, locating and analyzing company documents, communicating with other class members. These efforts occurred through numerous meetings with Class Counsel, telephone conferences, letters, emails, and text communications. I also spent substantial time assisting with preparation for mediation, where we obtained an extremely good result for the Class – with an average payment of almost \$2,500 per person. My work also continued after mediation, as I reviewed settlement agreements and other settlement documents, and continued communication with Class Counsel and other class members during the settlement approval processes.

6. Second, I respectfully request that the Court approve the agreed-upon service award because I agreed to set aside my personal interests and to put the interests of the class ahead or on par with my own. In doing so, and by successfully bringing this case as a class

1 action, I helped to obtain a highly beneficial settlement for the class members.

2 7. Third, as a condition of this class action settlement, I was required to release and
3 waive all possible individual claims against the company – something that none of the other class
4 members were required to give up.

5 8. Fourth, by bringing this case as a class action, I undertook significant risks and
6 stresses at a high emotional cost without any guarantee of success. For example, filing this
7 lawsuit and being a whistle blower was stressful on a day-to-day basis as I have constantly
8 worried about the risk that this case could impact my ability to find future jobs. This stress/risk
9 lasted for the entire case, and I'm worried it may make it hard to find a job in the future since the
10 case information is all available online. And, unfortunately, I believe that this actually occurred,
11 as I have had extreme difficulties obtaining other employment after filing this lawsuit – a
12 problem that did not exist previously and which I suspect may be connected to this lawsuit.

13 9. Fifth, bringing this case also came with a major financial risk because, if I lost the
14 case, I would be required to pay the company's costs, which could be over \$10,000, and there
15 was a chance they could try to make me pay their attorneys' fees as well.

16 10. Therefore, I respectfully request that the Court award the full requested service
17 award since that amount is justified based on the facts above.

18 I declare under penalty of perjury under the laws of the State of California that the
19 foregoing is true and correct. Executed on February 14, 2024, at Anaheim, California.

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21 By: 
22 Edward Cruz (Feb 14, 2024 12:09 PST)
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