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8
9 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**

10 **COUNTY OF LOS ANGELES**

11
12 **ELHAM TABIBIAN**, individually and on
13 behalf of all others similarly situated,

14 Plaintiff,

15 vs.

16 **PEPPERDINE UNIVERSITY**, a California
17 Non-Profit Corporation,

18 Defendant.
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CASE NO. 22STCV16736

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

1 I, Elham Tabibian, declare as follows:

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

5 2. I was employed by Pepperdine University as an adjunct instructor during Summer 2020
6 and Summer 2021.

7 3. I first discussed this lawsuit with my attorneys at HammondLaw, P.C. in May 2022.
8 Thereafter, I decided to proceed with my lawsuit against Pepperdine University because I wanted to
9 ensure that my fellow employees were afforded the protections of the Labor Code to which they are
10 entitled.

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

15 5. I am committed to representing the interests of the class. I do not believe, nor do I have
16 any reason to believe, that my interests are in conflict with or in any way antagonistic to the interests of
17 the Class, the proposed Settlement Administrator, or the proposed *cy pres* Bet Tzedek.

18 I declare under penalty of perjury under the laws of the United States and the State of California that the
19 foregoing is true and correct. Executed on 2/27/2023

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21 ELHAM TABIBIAN
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