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SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

ALBERT KNAPP, individually and on behalf
of all others similarly situated,

Plaintiff,

vs.

PEPPERDINE UNIVERSITY, a California
Non-Profit Corporation,
Defendant.

CASE NO. 22STCV16736

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

I, Albert Knapp, declare as follows:

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

2. I taught courses for Pepperdine University as an adjunct instructor from April 2020 to June 2021.

3. I first discussed this lawsuit with my attorneys in or about May 2022. Thereafter, I decided to proceed with my lawsuit against Pepperdine University because I wanted to ensure that my fellow employees were afforded the protections of the Labor Code to which they are entitled.

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

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

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed on Ch 10/10/2024.

ALBERT KNAPP