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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE**

MICHAEL KOTCHERHA, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

DEL'S FLOORING CONTRACTORS, INC.,
a California corporation; and DOES 1 through
100, inclusive

Defendants.

Case No. CVRI2202654

*[Case Assigned for all purposes to the Hon.
Harold W. Hopp, Dept. 1]*

**DECLARATION OF MICHAEL
KOTCHERHA IN SUPPORT OF
APPROVAL OF CLASS ACTION
SETTLEMENT**

Action Filed: June 19, 2022
Trial Date: None Set

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I, Michael Kotcherha, declare as follows:

1. I am an individual over the age of 18 and am the named Plaintiff in this matter. This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Del's Flooring Inc. ("Del's Flooring") between June 2021 and December 2021 as a flooring installer. My job duties involved traveling to various work locations, removing and disposing of old flooring, and installing new flooring. During the course of my employment, I was paid based on the square footage of the projects I completed, not the number of hours worked. I was not paid for time spent waiting for flooring materials or loading and unloading the trucks with materials. Additionally, the wage statements I was issued did not include the number of piece-rate units I earned each pay period or the rate for each piece. They also did not include Del's Flooring's address.

3. I brought this lawsuit against Del's Flooring because I wanted the company to comply with the law and treat its employees fairly. I believe that I have taken on a greater burden than any of the other employees because I have been actively involved in the litigation, and because it is my name that is attached to the lawsuit. I was willing to attach my name to the lawsuit, even though I understood it would be a public record, because I felt that someone needed to stand up to the company and I was willing to take on that burden for the benefit of my fellow co-workers.

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4. I have been an active participant in this case ever since first consulting with my attorneys over two and a half years ago. In addition to meeting with my attorneys and providing documents and information needed to initiate the case, I also regularly spoke with my attorneys to better explain Del's Flooring's policies and practices with them. I also made myself available the entire day of mediation. Overall, I estimate that I have spent at least 25 or more total hours on activities leading to the resolution of this matter

I declare under penalty of perjury under the laws of the state of California and the United States that the foregoing is true and correct. Executed on December 11, 2024, in Beaumont, California.

Michael Kotcherha

Michael Kotcherha
Michael Kotcherha (Dec 11, 2024 15:11 PST)

Michael Kotcherha