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8 *Attorneys for Plaintiffs and the Class*

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

11 DFT, INC. WAGE AND HOUR CASES

12 Coordinated Actions:

14 ERIC BETANCES vs. DFT, INC. D/B/A
CANNON MANAGEMENT

16 ROXANA VALDEZ vs. DFT, INC. D/B/A
17 CANNON MANAGEMENT

JUDICIAL COUNCIL COORDINATION
PROCEEDING NO.: JCCP4882

Honorable John Shepard Wiley, Jr.
Department SSC9

Superior Court of California, County of Los
Angeles: BC559751

Complaint Filed: October 6, 2014

Superior Court of California, County of San
Bernardino: CIVDS1605358

Complaint Filed: April 12, 2016

**DECLARATION OF ERIC BETANCES IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEYS' FEES,
COSTS, AND ENHANCEMENT PAYMENTS**

[Notice of Motion and Motion for Final Approval
of Class Action Settlement, Attorneys' Fees,
Costs, and Enhancement Payments; Declarations
of Class Counsel (Edwin Aiwazian and V. Andre
Sherman); Declaration of Class Representative
(Roxana Valdez); Declaration of Settlement
Administrator (Elizabeth Kruckenberg); and
[Proposed] Final Approval Order and Judgment
filed concurrently herewith]

Date: January 18, 2019
Time: 11:00 a.m.
Department: SSC9

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1 4. Throughout my involvement in the litigation, I was available to answer any
2 questions my attorneys had, and available to speak and meet with my attorneys whenever they
3 needed me. I responded to them as quickly as possible and gave them as much information as I
4 could. I spent at least 8 additional hours speaking with my attorneys about the matter, sending
5 them documents, identifying potential witnesses, and also describing documents, policies,
6 practices, and procedures of Defendant.

7 5. On August 11, 2015, I attended a full day of deposition that lasted approximately
8 7.5 hours. I spent at least 4 hours preparing for the deposition and approximately 2 additional
9 hours traveling to and from the deposition. After the deposition, I spent at least 3 hours
10 reviewing my testimony and discussing the contents of the deposition transcript with my
11 attorneys.

12 6. On September 2, 2015, I attended a partial day of deposition that lasted
13 approximately 2.5 hours. I spent at least 3 hours preparing for the deposition and approximately
14 2 additional hours traveling to and from the deposition. After the deposition, I spent at least 2
15 hours reviewing my testimony and discussing the contents of the deposition transcript with my
16 attorneys.

17 7. I spent about 2 hours reviewing the settlement agreement and about 1 hour asking
18 questions and discussing the potential settlement with my attorneys before signing the settlement
19 agreement.

20 8. I believe that I have done everything that my attorneys have asked of me and
21 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
22 obtained in this matter, and as a class representative, I respectfully request that the Court award
23 me an enhancement payment in the amount of \$7,500.00 for my active participation in the
24 litigation. Taking into consideration the time I dedicated to the matter, I believe that this amount
25 is reasonable.

26 9. I am not related to anyone associated with Lawyers *for* Justice, PC.

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10. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as an enhancement payment, as well as my share of the settlement fund as a class member.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this ^{Eric Betan} day of May 2018, at Santa Monica, California.


Eric Betances (May 30, 2018)
Eric Betances