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8 *Attorneys for Plaintiffs*

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:

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

15
16 ROXANA VALDEZ vs. DFT, INC. D/B/A
17 CANNON MANAGEMENT

JUDICIAL COUNCIL COORDINATION
PROCEEDING NO.: 4882

Honorable John S. 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

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19 **DECLARATION OF ROXANA**
20 **VALDEZ IN SUPPORT OF**
21 **PLAINTIFFS' MOTION FOR**
22 **PRELIMINARY APPROVAL OF**
23 **CLASS ACTION SETTLEMENT**

24 [Notice of Motion and Motion for
25 Preliminary Approval of Class Action
26 Settlement; Declarations of Proposed Class
27 Counsel (Edwin Aiwarzian and V. Andre
28 Sherman); Declaration of Proposed Class
Representative (Eric Betances); and
[Proposed] Order filed concurrently
herewith]

Date: June 13, 2018
Time: 10:00 a.m.
Department: 9

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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 7 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. In addition, during the discovery phase of the case, I
7 spent at least 4 hours reviewing Defendant's discovery requests, locating documents and
8 information, and providing responses to my attorneys.

9 5. On August 2, 2017, I attended a full day of deposition that lasted approximately 6
10 hours. I spent approximately 1 hour preparing for the deposition and approximately 4 additional
11 hours traveling to and from the deposition. After the deposition, I spent at least 2 hours
12 reviewing my testimony and discussing the contents of the deposition transcript with my
13 attorneys.

14 6. I spent about 2 hours reviewing the settlement agreement and about 1 hour asking
15 questions and discussing the potential settlement with my attorneys before signing the settlement
16 agreement.

17 7. I believe that I have done everything that my attorneys have asked of me and
18 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
19 obtained in this matter, and as a representative of the class, I respectfully request that the Court
20 award me an enhancement payment in the amount of \$5,000.00 for my active participation in
21 this litigation. Taking into consideration the time I dedicated to the matter, I believe that this
22 amount is reasonable.

23 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

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

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

3 Executed this 31 day of May 2018, at Mesa, Arizona.

4 Roxana Valdez
5 Roxana Valdez (Jun 1, 2018)

6 Roxana Valdez
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