

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

V. Andre Sherman (SBN 198684)
GIRARDI | KEESE
1126 Wilshire Boulevard
Los Angeles, California 90017
Tel: (213) 977-0211 / Fax: (213) 481-1554

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

DFT, INC. WAGE AND HOUR CASES

Coordinated Actions:

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

ROXANA VALDEZ vs. DFT, INC. D/B/A
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

**DECLARATION OF ERIC
BETANCES IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declarations of Proposed Class
Counsel (Edwin Aiwazian and V. Andre
Sherman); Declaration of Proposed Class
Representative (Roxana Valdez); 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 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 EricBeta day of May 2018, at Santa Monica, California.


Eric Betances (May 30, 2018)

Eric Betances