

1 Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
2 Joanna Ghosh (SBN 272479)
LAWYERS for JUSTICE, PC
3 410 West Arden Avenue, Suite 203
Glendale, California 91203
4 Tel: (818) 265-1020 / Fax: (818) 265-1021

5 *Attorneys for Plaintiff and the Class*

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SACRAMENTO**

10 QUENTIN COSTEIU; individually, and on
behalf of other members of the general public
11 similarly situated and on behalf of other
aggrieved employees pursuant to the California
12 Private Attorneys General Act;

13 Plaintiff,

14 vs.

15 INTERTEK TESTING SERVICES, an
unknown business entity; INTERTEK USA
16 INC., an unknown business entity; and DOES 1
through 100, inclusive,

17 Defendants.
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Case No.: 34-2016-00189662

Honorable Christopher E. Krueger
Department 54

CLASS ACTION

**DECLARATION OF QUENTIN
COSTEIU IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEYS' FEES,
COSTS, AND SERVICE AWARD**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Service Award;
Declaration of Class Counsel (Edwin
Aiwazian); Declaration of Settlement
Administrator (Lindsay Kline); and
[Proposed] Final Approval Order and
Judgment filed concurrently herewith]

Date: July 15, 2019
Time: 9:00 a.m.
Department: 54

Complaint Filed: January 26, 2016
Trial Date: None Set

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1 4. Throughout the case, I was available to answer any questions my attorneys had,
2 and available to speak and meet with my attorneys whenever they needed me. I responded to
3 them as quickly as possible and gave them as much information and identified as many
4 documents as I could. I spent at least 8 additional hours speaking with my attorneys about the
5 case, identifying potential witnesses, providing my attorneys with documents and information
6 concerning the case, and also describing policies, practices, and procedures of Intertek. In
7 addition, during the discovery phase of this case, I spent at least an additional 6 hours reviewing
8 Intertek, Inc.'s discovery requests, locating documents, and providing responses and documents
9 to my attorneys.

10 5. On July 21, 2016, I attended a full day of deposition that lasted approximately 8
11 hours. I spent at least 3 hours preparing for the deposition and approximately 3 additional hours
12 traveling to and from the deposition. After the deposition, I spent at least 2 hours reviewing my
13 testimony and discussing the contents of the deposition transcript with my attorneys.

14 6. As far as the settlement is concerned, I was available to review documents and
15 answer any questions my attorneys had. I spent about 2 hours reviewing the settlement
16 agreement and about 1 hour asking questions and discussing the potential settlement with my
17 attorneys before signing the settlement agreement.

18 7. I believe that I have done everything that my attorneys have asked of me and have
19 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
20 obtained in this case, and as a class representative, I respectfully request that the Court award me
21 a service award in the amount of \$8,000.00 for my active participation in this case. Taking into
22 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

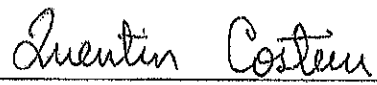
23 8. I am not related to anyone associated with *Lawyers for Justice, PC*.

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 a service award, as well as my share of the settlement fund as a class
27 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 30th day of September 2018, at Bay Point, California.

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5 Quentin Costeu

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