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8 *Attorneys for Plaintiffs*

9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF ORANGE**
12

13 WILLIAM CAMPOS; individually, and on
14 behalf of other members of the general public
15 similarly situated and on behalf of other
16 aggrieved employees pursuant to the
17 California Private Attorneys General Act;
18 JUANITA HERNANDEZ; individually, and
19 on behalf of other members of the general
20 public similarly situated and on behalf of other
21 aggrieved employees pursuant to the
22 California Private Attorneys General Act;

23 Plaintiffs,

24 vs.

25 MOTIVE ENERGY, INC., a California
26 corporation; MOTIVE ENERGY
27 TELECOMMUNICATIONS GROUP, INC., a
28 California corporation; ADVANCED
CHARGING TECHNOLOGIES, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 30-2016-00828352-CU-OE-CXC

Honorable William D. Cluster
Department CX102

**DECLARATION OF JUANITA
HERNANDEZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Edwin Aiwazian); Declaration of
Proposed Class Representative (William
Campos); and [Proposed] Order filed
concurrently herewith]

Date: August 24, 2018
Time: 9:00 a.m.
Department: CX102

Complaint Filed: January 5, 2016
FAC Filed: September 22, 2016
SAC Filed: December 2, 2016
Jury Trial: 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 Motive Energy. In
7 addition, during the discovery phase of this case, I spent at least an additional 5 hours reviewing
8 Motive Energy, Inc.'s discovery requests, locating documents, and providing responses to my
9 attorneys.

10 5. On January 12, 2017, I attended a full day of deposition that lasted approximately
11 7 hours. I spent at least 2 hours preparing for the deposition and approximately 2 additional
12 hours traveling to and from the deposition. After the deposition, I spent at least 2 hours
13 reviewing my testimony and discussing the contents of the deposition transcript with my
14 attorneys.

15 6. On March 31, 2017, I attended a second full day of deposition that lasted
16 approximately 7 hours. I spent at least 2 hours preparing for the deposition and approximately 2
17 additional hours traveling to and from the deposition. After the deposition, I spent at least 2
18 hours reviewing my testimony and discussing the contents of the deposition transcript with my
19 attorneys.

20 7. As far as the settlement is concerned, I was available to review documents and
21 answer any questions my attorneys had. I spent about 2 hours reviewing the settlement
22 agreement and about 1 hour asking questions and discussing the potential settlement with my
23 attorneys before signing the settlement agreement.

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

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

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

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

10 Executed this ⁰⁴ day of June 2018, at Anaheim, California.

11 *Juanita Hernandez*
Juanita Hernandez (Jul 4, 2018)

12 Juanita Hernandez