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Attorneys for Plaintiff VALERIE MAE LUNA,
on behalf of herself, all others similarly situated,
and on behalf of the general public

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES**

VALERIE MAE LUNA on behalf of herself,
all others similarly situated, and on behalf of
the general public,

Plaintiffs,

v.

ACCU BIO-CHEM LABORATORIES; and
DOES 1-100,

Defendants.

Case No. 22STCV35014

*[Assigned for All Purposes to the
Honorable Elihu M. Berle, Dept.6]*

**DECLARATION OF PLAINTIFF VALERIE
MAE LUNA IN SUPPORT OF
SETTLEMENT APPROVAL**

Date File: November 3, 2022

Trial Date: None Set

1 I, VALERIE MAE LUNA, hereby declare under penalty of perjury as follows:

- 2 1. I have personal knowledge of all matters stated herein, and if called as a witness, I could
3 and would competently testify thereto, except as to those matters stated upon information
4 and belief, and as to those matters, I believe them to be true.
- 5 2. I am a named Plaintiff and Class Representative in the above-captioned lawsuit, and I
6 submit this declaration in support of settlement approval.
- 7 3. I worked for Accu Bio-Chem Laboratories ("ABCL") as a non-exempt, hourly employee
8 during the Class Period.
- 9 4. Since becoming a class representative, I diligently worked on this case. I always answered
10 phone calls from my attorneys or called them back promptly when they called. I also
11 promptly responded to emails sent by my attorneys. On many occasions, I spoke with my
12 attorneys for case related purposes. At the beginning of the case, I searched for and
13 provided my attorneys with documents I received from ABCL, such as wage statements
14 and the employee handbook I received during my employment. I assisted my attorneys in
15 investigating the case. I have worked diligently to help progress the case.
- 16 5. I was aware that, at some point in this case, I would have my deposition taken. I knew that
17 the deposition could take a full day and that I may have to meet with my attorneys prior
18 to my deposition. I was at all times ready and willing to sit for my deposition.
- 19 6. Although I did not attend the mediation in person, I was available on the phone for all the
20 negotiations, which I was kept apprised of and assisted in. I gave my consent to settle with
21 ABCL for the gross settlement amount of \$235,000. I completely and carefully reviewed
22 the settlement agreement. I then signed the settlement agreement.
- 23 7. I estimate that I spent approximately 30 hours in prosecuting this case.
- 24 8. In light of the work I performed in this case and the duties associated with being a class
25 representative in a case of this magnitude, I believe the \$10,000 service payment award is
26 reasonable. I understand that this additional service award is not guaranteed and is subject
27 to Court approval.

1 9. I have and will continue to adequately represent all of the interests of the class. With my
2 status as class representative, I will treat the interests of the Class above my interests.

3 10. My claims are typical of the Class Members because I am similarly situated to all
4 individuals who worked for ABCL as non-exempt hourly employees in California at any
5 time between November 3, 2018, to August 19, 2023. Thus, my interests are the same as
6 all members of the proposed Class.

7 11. I recognize that any resolution of this matter must be approved by the Court in terms of
8 whether the settlement is fair and reasonable, and that I am obligated to protect the
9 interests of all of Class Members for the Class Period.

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

12 Dated: 8/28/2023

DocuSigned by:
By: 
7AABAF04C860158 VALERIE MAE LUNA