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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE**

KEITH PENDER, individually, and on
behalf of other members of the general
public similarly situated and other aggrieved
employees pursuant to the California Private
Attorneys General Act,

Plaintiff,

v.

CONGREGATIONAL HOMES, INC., an
unknown business entity; and DOES 1
through 100, inclusive,

Defendant.

Case No.: 21STCV29229

Honorable William F. Highberger
Department SSC10

CLASS ACTION

**DECLARATION OF KEITH PENDER IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, CLASS
COUNSEL FEES PAYMENT, CLASS
COUNSEL LITIGATION EXPENSES
PAYMENT, AND CLASS REPRESENTATIVE
ENHANCEMENT PAYMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement, Class
Counsel Fees Payment, Class Counsel
Litigation Expenses Payment, and
Enhancement Payment; Declaration of Class
Counsel (Edwin Aiwazian); Declaration of
Settlement Administrator (Yami Burns); and
[Proposed] Final Approval Order and
Judgment filed concurrently herewith]

Date: December 1, 2023
Time: 10:00 a.m.
Department: SSC10

Complaint Filed: August 9, 2021
FAC Filed: April 19, 2023
Trial Date: None Set

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1 spent at least 13 additional hours speaking with my attorneys about the case, identifying potential
2 witnesses, providing my attorneys with documents and information concerning the case, and also
3 describing policies, practices, and procedures of Congregational Homes.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I spent about 2 hours reviewing the settlement
6 agreement and about 3 hours asking questions and discussing the potential settlement with my
7 attorneys before signing the settlement agreement.

8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
10 and the State of California. I think my efforts helped to get the result obtained in this case, and
11 as a class and PAGA representative, I respectfully request that the Court award me an
12 enhancement payment in the amount of \$10,000.00 for my active participation in this case.
13 Taking into consideration the time that I have dedicated to this case, I believe that this amount is
14 reasonable.

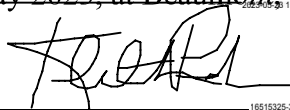
15 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

16 8. I have not entered into any undisclosed agreements, nor have I received any
17 undisclosed compensation in this case. The only compensation I will receive is whatever amount
18 the Court awards as an enhancement award, as well as my share of the settlement as a class
19 member and as an aggrieved employee.

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

05/23/2023

22 Executed this _____ day of May 2023, at Beaumont, California.

23 
24 Nintex AssureSign® 16515325-3ece-47af-84fc-b00b000221db

Keith Pender