

David Mara, Esq., (SBN 230498)
Matthew Crawford, Esq., (SBN 310230)
MARA LAW FIRM, PC
2650 Camino Del Rio North, Suite 302
San Diego, CA 92108
Telephone: 619.234.2833
Facsimile: 619.234.4048

Attorneys for Plaintiff JAMES QUEEN on
behalf of himself, all others similarly situated,
and on behalf of the general public.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

JAMES QUEEN on behalf of himself, all
others similarly situated, and on behalf of
the general public,

Plaintiff,

v.

SORENSEN COMMUNICATIONS,
LLC; and DOES 1-100,

Defendants.

Case No.: 37-2023-00017408-CU-OE-CTL

[Consolidated with Case No. 37-2023-
00016623-CU-OE-CTL]

**DECLARATION OF PLAINTIFF JAMES
QUEEN IN SUPPORT OF SETTLEMENT
APPROVAL**

1 I, James Queen, 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 the 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 Defendant Sorenson Communications, LLC ("Sorenson") as a non-exempt,
8 hourly employee in California during the Class Period.
- 9 4. Since becoming a class representative, I have diligently worked on this case. I always
10 answered phone calls from my attorneys or called them back promptly when they called.
11 I also promptly responded to emails sent by my attorneys. On many occasions, I spoke
12 with my attorneys for case related purposes. I assisted my attorneys in investigating the
13 case and. I have worked diligently to help progress the case.
- 14 5. I was aware that, at some point in this case, I would have my deposition taken. I knew that
15 the deposition could take a full day and that I may have to meet with my attorneys prior
16 to my deposition. I was at all times ready and willing to sit for my deposition.
- 17 6. Although I did not attend the mediation in person, I was available on the phone for all the
18 negotiations, which I was kept apprised of and assisted in. I gave my consent to settle with
19 Sorenson for the gross settlement amount of \$4,250,000. I completely and carefully
20 reviewed the memorandum of understanding and the settlement agreement. I then signed
21 both the memorandum of understanding and settlement agreement.
- 22 7. In light of the work I performed in this case and the duties associated with being a class
23 representative in a case of this magnitude, I believe the \$10,000 class representative
24 enhancement payment is reasonable. I understand that this additional payment is not
25 guaranteed and is subject to Court approval.
- 26 8. I have and will continue to adequately represent all of the interests of the class. With my
27 status as class representative, I will treat the interests of the Class above my interests.
28

1 9. My claims are typical of the Class Members because I am similarly situated to all current
2 and former non-exempt, hourly employees who worked for Sorenson in California at any
3 time during the Class Period. Thus, my interests are the same as all members of the
4 proposed Class.

5 10. I recognize that any resolution of this matter must be approved by the Court in terms of
6 whether the settlement is fair and reasonable, and that I am obligated to protect the
7 interests of all of class members for the Class Period.

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

10 Dated: April 26, 2024

DocuSigned by:
By: James Queen
62236E8049FA445 James Queen