Lilit Tunyan (SBN 329351)
ltunyan@tunyanlaw.com
Artur Tunyan (SBN 349174)
atunyan@tunyanlaw.com
TUNYAN LAW, APC
535 N. Brand Blvd., Suite 285
Glendale, California 91203
Telephone: (323) 410-5050

Attorneys for Plaintiff NATHAN COKER,
as an individual and on behalf of all employees similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

NATHAN COKER, as an individual and on behalf of all employees similarly situated,

Plaintiff,

v.

NIKU X LOS ANGELES, LLC, a California Limited Liability Company; and DOES 1 through 50, inclusive,

Defendants.

Case No.: 25STCV31947

[Assigned for all purposes to Hon. Bruce G. Iwasaki, Dept. 11]

CLASS AND PAGA REPRESENTATIVE ACTION

DECLARATION OF PLAINTIFF NATHAN COKER IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF CLASS AND PAGA REPRESENTATIVE ACTION SETTLEMENT

Date:	July 6, 2027
Time:	10 a.m.
Courtroom:	Department 11
Judge:	Hon. Bruce G. Iwasaki
Complaint Filed:	October 29, 2025
Trial:	None Yet Set

Docusign Envelope ID: 41A27CA7-681B-8BB0-82E4-28DA137945FB

DECLARATION OF NATHAN COKER

I, NATHAN COKER, declare as follows:

1. I am a named Plaintiff in this case as an employee of the named Defendant NIKU X LOS ANGELES, LLC ("Defendant"). As such, I have personal knowledge of, or am informed and believe, the following facts herein stated. If called as a witness. I could and would testify competently to the following:

JOB DUTIES AND EXPERIENCES

2. I worked for Defendant during the Class Period as an hourly-paid non-exempt employee from July 28, 2024 to September 28, 2025. I was paid on hourly basis and classified as non-exempt from overtime. Throughout my employment, I typically worked 5 days per workweek, and typically in excess of 8 hours in a workday.

3. While working for Defendant, I did not receive all meal and rest periods or they were short, interrupted or late. I was also required to work off-the-clock without compensation and was not reimbursed for using my personal cell phone for work.

DUTIES OF A CLASS REPRESENTATIVE

4. This lawsuit is not an individual lawsuit. It is a proposed class action. I understand that, if approved as a class representative in this matter, I have an obligation to do my best to look out for the interests of other class members, the current and former employees of Defendant who I am seeking to represent. I understand that my obligations to the class exist even when the class is certified solely as part of a class action settlement. It is my understanding that, as one part of this duty to the class, I cannot agree to a settlement to benefit myself to the exclusion of the rest of the class members. I have never asked my attorneys to simply settle this matter at any cost. Rather, I have asked them to obtain the best settlement they could within reason, and I believe that they have attempted to do so.

5. I have been actively involved in this case. I have never asked to be relieved from my role as a proposed class representative. To the contrary, I have made myself available whenever my attorneys wanted to discuss aspects of my employment at Defendant, and I remain committed to seeing this matter through to the end.

Docusign Envelope ID: 41A27CA7-681B-8BB0-82E4-28DA137945FB

6. I have conferred with my attorneys about the settlement proposed in this case. I am not an accountant, but I understand the factors and risks that need to be considered when evaluating a settlement. I believe that the Class Action Settlement obtained on behalf of the Class Members is fair and reasonable in view of the issues and risks involved with the case.

7. I am asking to the be stand-in for other employees of Defendant. Because of that, I cannot quit on the Class, and I cannot put myself and my interests before the Class. I accept these duties and request that I be approved as the class representative for purposes of this Settlement.

COMMUNITY OF INTEREST: TYPICALITY AND ADEQUACY

8. I was an hourly non-exempt employee of Defendant and was subject to the same pay structure and rules as all the other hourly non-exempt employees of Defendant.

9. I am not aware of anything special about me that would raise unique defenses to my claims, as opposed to the claims of the class. I am also not suing for anything unique to me. Rather, my claims are based upon the same facts that relate to the rest of the Class.

10. I do not believe that I have any conflicts with Class Members included in this proposed Settlement. I do not have any intention to take any action that would place me in a position that is hostile to other Class Members. I also do not believe I have any conflicts of interest with the selected class action settlement administrator Phoenix Class Administration Solutions.

SERVICE AS A CLASS REPRESENTATIVE

11. I believe if not for my stepping forward and taking on the duties of protecting the interests all aggrieved former and current employees of Defendant, it is likely that the interests of the Class would neither have been prosecuted, nor benefited. To my knowledge, other than the litigation encompassed by this proposed Settlement, there is no other litigation concerning the claims in this lawsuit.

12. I have assumed some long-lasting risk in prosecuting this case. Because it is so easy to search for information online these days, I will face an increased risk that future employers will discover information about this lawsuit online and have a negative reaction to learning that I sued an employer. This may make it harder for me to obtain future employment or change jobs for a better opportunity.

Docusign Envelope ID: 41A27CA7-681B-8BB0-82E4-28DA137945FB

13. I have devoted a substantial amount of my time, both before this lawsuit was filed and also during its litigation, to ensure a fair result for the employee Class. This involved ongoing communication and participation with my Counsel during the course of this case. My participation began with bringing certain issues that are involved in this matter to my Counsel's attention and explaining the factual background that was used to prosecute the claims in this case. For example, I reviewed documents which I already had, I provided relevant documents to my Counsel, and I explained those documents and related facts to my Counsel to assist them in their review during multiple meetings with my attorneys.

14. My efforts continued after the suit was filed. For example, I have had many discussions with my attorneys regarding Defendant's wage and hour policies, my claims in this case, litigation strategy, potential witnesses, discovery, updates on how the case was proceeding, and how I could help the case. I also discussed strategy with my attorneys. I remained in regular communication with my attorneys regarding discovery and settlement discussions that the parties had during the course of litigation and mediation. I continued to identify employees and other witnesses to counsel, along with other information as to how they could be of potential use in this matter. I also provided substantial information and documents to my attorneys to assist them in preparing the case.

15. After the mediation, a long-form settlement agreement was negotiated, and I reviewed it with my Counsel to ensure that its terms are likewise fair and adequate.

16. I believe that the Class Representative Service Payment of $8,000.00 for me is fair and reasonable. This enhancement takes into consideration the time, effort, risks, stress, and sacrifice of signing a general release of all claims over just wage and hour claims, as well as the benefit provided to all class members as a result of my involvement in this litigation. In sum, in addition to assuming the risks that go along with being a class representative and named plaintiff in litigation, I believe I have also provided well over 20 hours of my time during the course of this litigation to ensure a good outcome for the best interests of the Class. I believe I have been diligent and acted above and beyond that which is expected of a Class Representative throughout all stages of the litigation. I will continue to diligently act as the Class Representative up to and including final approval of the Class Action Settlement.

Docusign Envelope ID: 41A27CA7-681B-8BB0-82E4-28DA137945FB

17. Furthermore, it is my opinion that the enhancement is fair and reasonable because in addition to the many hours spent participating in this case, I accepted the potential risk of being liable for the opposing parties' costs if we were unsuccessful in this lawsuit. My attorneys told me these costs could be tens of thousands of dollars or more based on the extent of formal litigation. I believed in this case and was willing to be a Class Representative Plaintiff knowing the risks involved.

18. I signed a general release, so I am not only giving up my wage and hour claims, but I am also giving up all claims beyond wage and hour claims I had against my former employer.

19. This litigation has also resulted in a valuable benefit to the Class Members who will participate in the monetary payout of this Settlement because of my involvement. As a result of this Settlement, Class Members are receiving thousands of dollars in Settlement checks.

20. I also risk the potential stigma of being a Class Representative in a class action labor dispute, which may affect my future employment in this industry. A Google search with my name and Defendant show that I am a Plaintiff in this class action case.

21. Based on the time, risk, stress, sacrifice of signing of a general release, and the great outcome of this case, I believe that the requested enhancement for me is fair and reasonable.

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

Executed 10/27/2026 | 4:46 PM PDT at Sherman Oaks, California.

Signed by:
Nathan Coker
[illegible]

NATHAN COKER, "Declarant"

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 535 N. Brand Blvd., Suite 285 Glendale, California 91203. On November 4, 2026, I served the foregoing document described as:

On the date indicated below, I served the document described as: **DECLARATION OF PLAINTIFF NATHAN COKER IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF CLASS AND PAGA REPRESENTATIVE ACTION SETTLEMENT** on the interested parties in this action by sending a true copy thereof to interested parties as follows and as stated on the attached service list:

Victor Xu
vxu@fisherphillips.com
FISHER & PHILLIPS LLP
2050 Main Street, Suite 1000
Irvine, California 92614
Telephone: (949) 798-2105
Facsimile: (949) 851-0152

Harrison M. Thorne
hthorne@fisherphillips.com
Jasmine Kiaei
jkiaei@fisherphillips.com
Jennie Tran
jqtran@fisherphillips.com
FISHER & PHILLIPS LLP
444 South Flower Street, Suite 1500
Los Angeles, California 90071
Telephone: (213) 330-4500
Facsimile: (213) 330-4501
Attorneys for Defendant NIKU X LOS ANGELES, LLC

[✓] **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed above via third-party cloud service **CASEANYWHERE**.I did not receive an error message.

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

Executed on November 4, 2026 Glendale, California.

Lilit Tunyan
Name

Signature