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

CHRIS MOORER, individually, and on
behalf of other members of the general public
similarly situated; FAZON WILLIAMS,
individually, and on behalf of other members
of the general public similarly situated and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiffs,

vs.

PROVANTAGE CORPORATE
SOLUTIONS, LLC, an unknown business
entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 21STCV24842

Honorable Carolyn B. Kuhl
Department 12

CLASS ACTION

**DECLARATION OF PLAINTIFF CHRIS
MOORER IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: February 25, 2025

Time: 10:30 a.m.

Department: 12

Complaint Filed: July 7, 2021

FAC Filed: November 4, 2024

DECLARATION OF CHRIS MOORER

I, **Chris Moorer**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned action (“Action”). I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Provantage Corporate Solutions, LLC (“Defendant”) from approximately June 2017 to approximately September 2017 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and class representative. Prior to commencing the Action, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout this matter, I have spent time speaking with my attorneys regarding the matters and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. Throughout these matters, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents

1 as I could. I spent time speaking with my attorneys about the cases, identifying potential witnesses,
2 providing my attorneys with documents and information concerning the cases, and also describing
3 policies, practices, and procedures of Defendant.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I reviewed the Settlement Agreement and discussed the
6 questions I had regarding the potential settlement with my attorneys before signing the settlement
7 papers.

8 6. I think my efforts helped to get the result obtained in the Action, and as a potential
9 class representative, I respectfully request that the Court award me an enhancement award of
10 \$7,500.00 for my efforts in pursuing and participating in the Action, as well as my broader release
11 of claims. Taking into consideration the time that I have dedicated to the Action, I believe that this
12 amount is reasonable.

13 7. I am not related to anyone associated with Lawyers for Justice, PC, Diversity Law
14 Group, P.C., Hyun Legal, APC, or Law Offices of Choi & Associates.

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

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

21 Executed on 11/21/2024, at Victorville, California

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23 
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Chris Moorer