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*Attorneys for Plaintiff CYNTHIA MOLT, individually,
and on behalf of other similarly situated employees and
Aggrieved Employees pursuant to the California Private
Attorneys General Act*

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

CYNTHIA MOLT, individually, and on behalf of
other similarly situated employees and Aggrieved
Employees pursuant to the California Private
Attorneys General Act,

Plaintiff,

vs.

LOS ANGELES FILM SCHOOL, LLC, a
California limited liability company, dba LOS
ANGELES RECORDING STUDIO; and DOES 1
through 25, inclusive,

Defendants.

Case No.: 23STCV30757

Hon. Kevin C. Brazile, Department 20

**DECLARATION OF PLAINTIFF
CYNTHIA MOLT IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT, CLASS COUNSEL FEES
PAYMENT, CLASS COUNSEL
LITIGATION EXPENSES PAYMENT,
CLASS REPRESENTATIVE SERVICE
PAYMENT, AND SETTLEMENT
ADMINISTRATOR COSTS**

Date: October 22, 2025
Time: 8:30 a.m.
Dept.: 20

Complaint Filed: December 18, 2023
FAC Filed: November 1, 2024
Trial Date: Not Set

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1. I am over the age of eighteen (18) and a resident of the State of California. I am the named plaintiff in the above-captioned case. 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.

3. Because I thought Defendant's practices may not be lawful, I decided to seek legal advice about my work experiences at Los Angeles Film School and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits under the Private Attorneys General Act ("PAGA"), and what it meant to bring a class and PAGA action so that I understood what I was considering doing.

4. I have regularly conferred with my attorneys regarding the case as part of my responsibilities as a class and PAGA representative. This process included searching for and providing documents concerning my employment with Los Angeles Film School, answering any questions my attorneys had about the documents, providing information regarding the company's practices and the duties of other non-exempt employees, and helping my attorneys develop a strategy as to what additional documents and information they could seek to obtain from Los Angeles Film School. I also did my own research, reviewed documents, and had extensive discussions with my attorneys.

5. 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. I made myself available to answer any questions my attorneys had about Los Angeles Film School's practices and treatment of its employees whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could.

6. I understood that in the event this matter did not settle and proceeded to trial, I would

1 need to respond to discovery, attend deposition(s), help my counsel in any way they requested, and be
2 in court to participate in the trial. I was ready to perform that role, as well as fulfill any other
3 responsibilities that are necessary for this lawsuit. I was ready to, and did, vigorously, adequately, and
4 fairly represent the interests of the Class and understood that I must take steps to adequately represent
5 the Class and their interests.

6 7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
7 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
8 also understood there was a risk of losing any current job and/or income due to the time that I would
9 have to spend fulfilling my responsibilities in this matter, including having to attend a deposition and
10 trial, if needed. I have not been able to obtain full-time employment since my employment ended with
11 Defendant.

12 8. Most importantly, I believe that by pursuing this case, I have taken a significant risk
13 because future employers can easily find out that I sued my prior employer, and that may negatively
14 impact my ability to find employment within this industry – and even outside of it – in the future. In
15 contrast, the other employees who will be receiving money from this lawsuit did not have to file a
16 claim or take the risk that I took in bringing this action.

17 9. I reviewed the settlement agreement, discussed the settlement agreement with my
18 attorneys, and asked them questions before signing it.

19 10. I believe that I have done everything that my attorneys have asked of me and tried, to
20 the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California.
21 In total, I have spent approximately 30 to 35 hours participating in this case as described above. I
22 believe my efforts helped get the result obtained in this case.

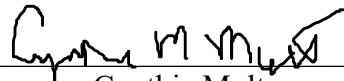
23 11. I understand that any resolution of this lawsuit on a class wide basis is subject to court
24 approval, and any settlement must be determined to be in the best interest of the Class as a whole. At
25 all times throughout the course of this litigation I have considered the interests of the Class and put
26 them before my own personal interests.

27 12. I understand that incentive or enhancement awards are discretionary and intended to
28 compensate named plaintiffs for the quality and quantity of the work done on behalf of the class and

1 other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA
2 action, and an acknowledgment of the benefits resulting from the representative's actions. I believe
3 my work in this matter is meritorious on these points for the reasons set forth above.

4 13. I respectfully request that the Court approve and award me a Class Service
5 Representative Payment in the amount of \$7,500.00 for my efforts and active participation in the case
6 and for the broader, general release of all claims that I have or may have against Los Angeles Film
7 School in connection with the settlement. Taking into consideration the time that I dedicated to this
8 case, I believe that this amount is reasonable.

9
10 I declare under penalty of perjury under the laws of the State of California that the foregoing
11 is true and correct. Executed on 03/10/2025, at Monrovia, California.

12
13 
14 Cynthia Molt