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Attorneys for Plaintiff Leonard Moore and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

ELIZABETH CHAVEZ; LEONARD
MOORE, individually and on behalf of others
similarly situated and aggrieved employees
pursuant to the California Private Attorneys
General Act,

Plaintiff,

vs.

TRUEPILL, INC., a Delaware corporation;
and DOES 1 through 25, inclusive,

Defendants.

Case No.: 23CV047001

Honorable Patrick McKinney
Department 18

**DECLARATION OF PLAINTIFF
LEONARD MOORE 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 ADMINISTRATION
EXPENSES PAYMENT**

Reservation ID: A-47001-001
Date: May 6, 2026
Time: 1:30 p.m.
Dept: 18

Complaint Filed: October 10, 2023
FAC Filed: October 20, 2025
Trial Date: Not Set

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1 6. I understood that in the event this matter did not settle and proceeded with trial, I would
2 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
3 responsibilities that are necessary for this lawsuit.

4 7. I know that I took a sizeable risk by substituting in to pursue this lawsuit for several
5 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
6 also understood there was a risk of losing any job and/or income due to the time that I would have to
7 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. In
8 contrast, the other employees who will be receiving money from this lawsuit did not have to file a
9 claim or take the risk that I took in pursuing this action.

10 8. I reviewed the settlement agreement, discussed the settlement agreement with my
11 attorneys, and asked them questions before signing it.

12 9. I believe that I have done everything that my attorneys have asked of me and tried, to
13 the best of my ability, to seek relief for the Class, the Aggrieved Employees, and the State of
14 California. I have spent approximately 30-35 hours participating in this case as described above. I
15 believe my efforts helped get the result obtained in this case.

16 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
17 approval, and any settlement must be designed in the best interest of the Class as a whole. At all times
18 throughout the course of this litigation I have considered the interests of the Class and the Aggrieved
19 Employees and put them before my own personal interests.

20 11. I understand that incentive or enhancement awards are discretionary and intended to
21 compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and
22 other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA
23 action, and an acknowledgment of the benefits resulting from the representative's actions. I believe
24 my work in this matter is meritorious on these points for the reasons set forth above.

25 12. I respectfully request that the Court approve and award me a Class Representative
26 Service Payment in the amount of \$7,500.00 for my efforts and active participation in the case and for
27 the broader, general release of all claims that I have or may have against Defendant in connection with
28 the settlement. Taking into consideration the time that I dedicated to this case, I believe that this

1 amount is reasonable.

2 13. I am not related to anyone associated with Blackstone Law, APC.

3 I declare under penalty of perjury under the laws of the State of California that the foregoing
4 is true and correct. Executed on 11/19/2025, at Oakland, California.

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6 *Leonard Moore*

7 Leonard Moore
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