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9 *Attorneys for Plaintiffs and the Putative Class*

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

11 BENNY ADAMS, *et al.*,
12 Plaintiff,
13 v.
14 CROSSING, INC, *et al.*,
15 Defendants.

CLASS ACTION
Case No: 24STCV27904
Assigned to Judge Samantha P. Jessner
Dept. 7

**DECLARATION OF BENNY ADAMS IN
SUPPORT OF PLAINTIFF BENNY ADAMS'
AND KELSEY CECO'S MOTION FOR
CONDITIONAL CLASS CERTIFICATION
AND PRELIMINARY APPROVAL OF CLASS
ACTION AND PRIVATE ATTORNEY
GENERAL ACT SETTLEMENT**

Date: October 8, 2026
Time: 10:00 a.m.
Place: Dept. 7

Initial Complaint Filed: October 24, 2024
Initial Trial Date: None Set

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1. I am over the age of 18 and a resident of California. I have personal and first-hand knowledge of the matters stated herein, and, if called and sworn as a witness, I could and would testify competently hereto.

3. Throughout this Action I have had independent knowledge of this case.

5. Through my attorneys, I filed a class action on October 24, 2024 against Defendants Crossing, Inc. and Siliang Di for (1) Failure to Pay Minimum Wages [Cal. Lab. Code §§ 1182, 1182.12, 1194, 1194.2, 1197, and 1197.1; 8 Cal. Code Regs. § 11040(4)]; (2) Failure to Pay Overtime and Double Time Compensation [Cal. Lab. Code §§ 510, 1194, 1198; 8 Cal. Code Regs. § 11040(3)]; (3) Failure to Provide Meal Periods [Cal. Lab. Code §§ 226.7, 512; 8 Cal. Code Regs. § 11040(11)]; (4) Failure to Provide Rest Periods [Cal. Lab. Code § 226.7; 8 Cal. Code Regs. § 11040(12)]; (5) Failure to Provide Accurate Itemized Wage Statements [Cal. Lab. Code §§ 226, 226.3; 8 Cal. Code Regs. § 11040(7)]; (6) Failure to Pay Earned Wages Upon Separation [Cal. Lab. Code §§ 201, 202, and 203]; and (7) Unfair Competition and Unlawful Business Practices [Cal. Bus. & Prof. Code § 17200, et seq.].

7. Subsequently, on May 20, 2025, through my attorneys, a Second Amended Complaint was filed, which named Kelsey Ceko as a co-plaintiff and expanded the class definition to include a subclass of non-exempt employees who were misclassified as independent contractors and/or 1099 employees.

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1 of the Class. More specifically:

- 2 (a) I consulted with my attorneys before the initiation of this Action to provide
- 3 them with preliminary facts and documents necessary to investigate the
- 4 potential claims against the Defendants;
- 5 (b) Throughout the litigation, I maintained regular communications with my
- 6 attorneys, both to inform them of new developments and to request updates
- 7 from them;
- 8 (c) I provided my attorneys with information and documents, including
- 9 information regarding the pre-stream and post-stream work I performed, my
- 10 unpaid wages and overtime, and the meal and rest periods I was denied, which
- 11 I believe helped substantiate the Labor Code violations alleged in this Action;
- 12 (d) I assisted my attorneys in preparing responses to voluminous discovery requests
- 13 which included 83 Special Interrogatories, Form Interrogatories, Request for
- 14 Production of Documents, and Request for Admissions. I also provided to my
- 15 attorneys documents and evidence responsive to the document requests.
- 16 (e) I assisted my attorneys in identifying potential witnesses to corroborate the
- 17 claims alleged in this Action;
- 18 (f) I assisted my attorneys in preparing for the mediation that resulted in this
- 19 Settlement, and I remained in communication with my attorneys after the case
- 20 settled at mediation; and
- 21 (g) I reviewed documents relating to the Settlement, including the Settlement
- 22 Agreement.

23 9. I decided to pursue this Action because I believe it is the right thing to do to protect

24 the rights and interests of the current and former non-exempt employees of Defendants.

25 10. My attorneys explained the risks and benefits of bringing a class action. I understood

26 the professional and financial risks of being a Class Representative. I also understood that pursuing

27 the case as a class action rather than an individual case meant that it would likely take longer to

28 receive any recovery because of the multi-step approval process that the courts require. I also

1 understood the possibility of receiving a discounted recovery, or no recovery at all, given the risks
2 and complexities of class action litigation.

3 11. I willingly took on the risks and burdens of litigation because I felt strongly about
4 serving as a Class Representative and representing the Class Members in this case.

5 12. I have put the interests of the Class above my own, and I believe that the Settlement is
6 fair and reasonable in light of the issues presented in this case.

7 13. I have not received any personal benefit from this case other than knowing that the
8 other employees will receive fair compensation for the wages due to them, nor have I entered into
9 any other undisclosed agreements involving this case.

10 14. Pursuant to the terms of the Settlement, I understand that I will be subject to a broader
11 general release, including a waiver of rights under section 1542 of the California Civil Code, than the
12 limited release applicable to the Participating Class Members.

13 15. This Action is being prosecuted jointly by my counsel of record, Baker, Burton &
14 Lundy, P.C., and the Law Office of Richard Kim, P.C. My attorneys have explained to me the fee-
15 sharing agreement between the two firms, to which I have provided my written consent. I am not
16 related to anyone associated with these law firms.

17 16. Pursuant to the terms of the Settlement, I understand that the Defendants will not
18 object to or oppose my request for a service award of \$8,500.00. I understand that, at the time of
19 Final Approval, the Court may reduce the amount I am requesting, with the remainder going towards
20 and benefiting the Participating Class Members.

21 17. I also understand that this service award is a separate payment, in addition to any
22 amount I would ordinarily be entitled to recover as a Participating Class Member or as an Aggrieved
23 Employee under the terms of the Settlement.

24 18. I have no conflict of interest with the Administrator, CPT Group, Inc., and I am not
25 related to or affiliated with anyone within CPT Group, Inc.

26 19. I understand that a class notice will be issued to members of the class if the Court
27 approves this motion for preliminary approval. During my experience working with Defendants,
28 hosts and co-hosts conducted live-streamed sales in English, continuously engaged with English-

1 speaking audiences and moderated English-language chats. For this reason, I do not believe that a
2 Spanish translation of the notice is necessary.

3 I declare under penalty of perjury, under the laws of the State of California, that the foregoing
4 is true and correct, this 2nd day of July, 2026.

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6 Benny John Adams IV (Jul 2, 2026 13:47:14 PDT)
7 BENNY ADAMS
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1 **PROOF OF SERVICE**

2 **RE: *Benny Adams v. Crossing, Inc., et al.***
3 **Case No: 24STCV27904**
LWDA Case No: LWDA-CM- 1058105 -24

4 I am employed in the State of California, County of Los Angeles. I am over the age of 18 and
5 not a party to this action. My business address is 515 Pier Avenue, Hermosa Beach, CA 90254.

6 On **July 2, 2026**, I served true and correct copies of the following document(s) described as:

7 **DECLARATION OF BENNY ADAMS IN SUPPORT OF PLAINTIFF BENNY ADAMS' AND**
8 **KELSEY CECO'S MOTION FOR CONDITIONAL CLASS CERTIFICATION AND**
9 **PRELIMINARY APPROVAL OF CLASS ACTION AND PRIVATE ATTORNEY GENERAL**
10 **ACT SETTLEMENT**

11 on the interested parties as follows:

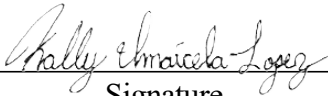
12 Labor and Workforce Development Agency
13 800 Capital Mall, Suite 500
14 Sacramento, California 95814

15 ☒ **BY ELECTRONIC SUBMISSION:** Complying with CAL. LAB. CODE §§ 2699(l)(4) and
16 2699.3, I caused true and correct copies of the documents to be served on the Labor and
17 Workforce Development Agency through its online platform at <https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>.

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

20 Executed on **July 2, 2026** at Hermosa Beach, California.

21 Kally Imaicela-Lopez
22 Type or Print Name

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24 Signature

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PROOF OF SERVICE

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Case No: 24STCV27904

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PRELIMINARY APPROVAL OF CLASS ACTION AND PRIVATE ATTORNEY GENERAL
ACT SETTLEMENT**

on the interested parties as follows:

Sarina Saluja, Esq.
ssaluja@loeb.com
LOEB & LOEB LLP
10100 Santa Monica Blvd, Suite 2200
Los Angeles, CA 90067

Counsel for Defendants
CROSSING, INC.
SILIANG DI

Richard Kim, Esq.
rkim@richkimlaw.com
Ian Nomura, Esq.
inomura@richkimlaw.com
LAW OFFICES OF RICHARD KIM, P.C.
6131 Orangethorpe Ave., Suite 370
Buena Park, CA 90620-4929
cc: Nathan Seong
nseong@richkimlaw.com

*Co-Counsel for Plaintiff and the Putative
Class*

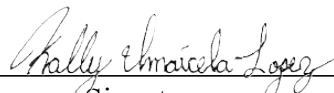
[] **VIA MAIL (ENCLOSED IN A SEALED ENVELOPE):** I deposited the envelope(s) for mailing in the ordinary course of business at Hermosa Beach, California. I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. Under that practice, sealed envelopes are deposited with the U.S. Postal Service that same day in the ordinary course of business with postage thereon fully prepaid at Hermosa Beach, California.

[✓] **VIA CASE ANYWHERE:** Complying with California Rule of Court 2.251 and Code of Civil Procedure § 1010.6, *et. seq.*, and in compliance with the Court's Order Authorizing Electronic Service, I caused true and correct copies of the documents to be served through Case Anywhere at www.caseanywhere.com to the email address(es) of the person(s) identified above.

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

Executed on **July 2, 2026** at Hermosa Beach, California.

Kally Imaicela-Lopez
Type or Print Name


Signature