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Attorneys for SHANE HUBER, on behalf of himself,
all others similarly situated, and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

SHANE HUBER on behalf of himself,
all others similarly situated, and on
behalf of the general public,

Plaintiffs,

v.

LIFE CHIROPRACTIC COLLEGE
WEST INCORPORATED; and DOES 1-
100,

Defendants.

Case No. 24CV060892

**DECLARATION OF PLAINTIFF SHANE
HUBER IN SUPPORT OF SETTLEMENT
APPROVAL**

Complaint Filed: November 20, 2024
Trial Date: None Set

I, SHANE HUBER, hereby declare under penalty of perjury as follows:

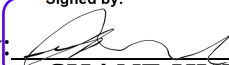
1. I have personal knowledge of all matters stated herein, and if called as a witness, I could and would competently testify thereto, except as to those matters stated upon information and belief, and as to those matters, I believe them to be true.
2. I am a named Plaintiff and Class Representative in the above-captioned lawsuit, and I submit this declaration in support of settlement approval.
3. I worked for Defendant LIFE CHIROPRACTIC COLLEGE WEST INCORPORATED (“Life Chiropractic” or “Defendant”) as a non-exempt, hourly worker at in California during the Class Period. I worked for Life Chiropractic as a campus enhancement/maintenance employee from approximately December 1, 2016, to approximately November 27, 2023.
4. On November 20, 2024, I brought this class action lawsuit. Prior to filing, I understood that, if this case was filed as a class action, I would not only be seeking compensation for myself, but I would also be representing the interests of all other class members who, like myself, were employed by Life Chiropractic in California.
5. I had many meetings and conversations with my attorneys about my experience working for Life Chiropractic. Since becoming a class representative, I diligently worked on this case. Throughout this litigation, I regularly conferred with my attorneys to discuss the status of the case, to offer my input, and to assist my attorneys in gathering the evidence necessary to prosecute the claims. I always answered phone calls from my attorneys or called them back promptly when they called. I also promptly responded to emails sent by my attorneys. On many occasions, I spoke with my attorneys for case related purposes. I assisted my attorneys in investigating the case. I also looked for documents from my employment with Life Chiropractic and provided my attorneys with all documents I found. I provided my attorneys with pay documents. I have worked diligently to help progress the case.

- 1 6. I was aware that, at some point in this case, I would have my deposition taken. I knew that
2 the deposition could take a full day and that I may have to meet with my attorneys prior
3 to my deposition. I was at all times ready and willing to sit for my deposition.
- 4 7. Although I did not attend the mediation in person, I was available on the phone for all the
5 negotiations, which I was kept apprised of and assisted in. I gave my consent to settle with
6 Life Chiropractic for the gross settlement amount of \$325,000. I completely and carefully
7 reviewed the Memorandum of Understanding and settlement agreement. I then signed
8 them.
- 9 8. From the very beginning, I understood that I was participating not only for my own benefit,
10 but for the many past and present employees of Life Chiropractic. I understood that there
11 were risks involved in class action lawsuits. I understood that the lawsuit could continue
12 for several years and require my services and attention the entire length of the lawsuit.
- 13 9. In light of the work I performed in this case and the duties associated with being a class
14 representative in a case of this magnitude, I believe the \$10,000 class representative
15 enhancement payment is reasonable. I understand that this additional payment is not
16 guaranteed and is subject to Court approval.
- 17 10. I have and will continue to adequately represent all of the interests of the class. With my
18 status as class representative, I will treat the interests of the Class above my interests.
- 19 11. My claims are typical of the Class Members because I am similarly situated to all current
20 and former hourly-paid non-exempt employees of Defendant who worked for Defendant
21 within the State of California at any time from November 20, 2020, to January 17, 2026.
22 Thus, my interests are the same as all members of the proposed Class.
- 23 12. In summary, over the course of this litigation I have spent a significant amount of time
24 conferring and working with my attorneys on the prosecution of my claims and evaluating
25 the settlement and related documents. I have spent numerous hours of my time assisting
26 and providing information to my attorneys in the prosecution of this lawsuit.

1 13. I recognize that any resolution of this matter must be approved by the Court in terms of
2 whether the settlement is fair and reasonable, and that I am obligated to protect the
3 interests of all of class members for the Class Period.

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

6 Dated: 8/19/2026

Signed by:
By: 
SHANE HUBER