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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO**

BART CHAMBERLAIN and MALIK AZIZ
TAYLOR, AKA ROBERT TAYLOR,
individuals, on behalf of themselves and on
behalf of all persons similarly situated,

Plaintiffs,

vs.

NTT DATA AMERICAS, INC., a
Corporation; NTT DATA SERVICES
HOLDINGS CORPORATION, a Corporation;
NTT DATA SERVICES, LLC, a Limited
Liability Company; NTT DATA STATE
HEALTH CONSULTING, LLC, a Limited
Liability Company; and DOES 1 through 50,
inclusive,

Defendants.

CASE NO.: 24CV016003

**DECLARATION OF PLAINTIFF MALIK
AZIZ TAYLOR AKA ROBERT TAYLOR
IN SUPPORT OF UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS SETTLEMENT**

Hearing Date: November 21, 2025_
Hearing Time: 9:00 a.m.
Reservation ID # A-16003-001

Judge: Hon. Jill H. Talley
Dept: 23

Date Filed: August 12, 2024
Trial Date: Not set

1 I, MALIK AZIZ TAYLOR AKA ROBERT TAYLOR, declare as follows:

2 1. I am a named representative in this case. I submit this declaration in support of
3 Plaintiffs' Unopposed Motion for Preliminary Approval of Class Settlement. I make this
4 statement of my own personal knowledge, and if called to testify, I could and would testify
5 competently to the facts below.

6 2. I was employed by NTT Data Services, LLC ("NTT") as an hourly paid non-
7 exempt employee.

8 3. During my time working for NTT, I believe that I was not paid all wages, including
9 all minimum and overtime wages, owed to me. I also believe I was denied uninterrupted meal and
10 rest breaks, and I was not reimbursed for tools I purchased to perform work for Defendant or for
11 using my personal cell phone for the benefit of Defendant.

12 4. During the time that I was employed at NTT, I followed the same timekeeping,
13 scheduling and payroll policies and practices as the other hourly employees I observed and
14 interacted with.

15 5. At the beginning of this case, my attorneys made me aware of the general
16 obligations of serving a class representative Plaintiff in this case. Because of the wage and hour
17 violations that I experienced during my employment with NTT, I agreed to serve as a class
18 representative Plaintiff and pursue my case as a class and representative action on behalf of the
19 State of California and similarly situated employees of NTT.

20 6. By deciding to serve as a Named Plaintiff in this case, I agreed to pursue not only
21 my own wage and hour claims, but the claims of all similarly situated employees of NTT, and, if
22 necessary, to put the interest of all similarly situated employees ahead of my own. I have no
23 interests that are antagonistic to my coworkers with respect to the claims alleged in this case. I
24 pledged to actively participate in the lawsuit and to assume the risks of serving as a Named
25 Plaintiff in a class action. My attorney also explained the risks associated with litigation, and that
26 the case could take years to resolve, and therefore required a long-term commitment on my part. I
27 also understood I was potentially responsible for paying NTT's attorney's fees and costs.

28 7. During this litigation, I have spent a significant amount of time working with my
attorneys and participating in this lawsuit as follows:

a. I regularly conferenced with my attorneys, before and after the filing of the lawsuit,
to discuss the status of the case, to offer my input on NTT's practices and policies, to provide

1 names of witnesses, to assist in gathering evidence and documents that supported the claims, and
2 to discuss settlement options; and

3 b. I also spent significant time helping my attorneys prepare for mediation and
4 answering questions about how NTT's policies and practices impacted me and my coworkers. I
5 made myself available during the entirety of the all-day mediation which took place on zoom,
6 approved the tentative settlement, and reviewed and approved the final settlement agreement. I
7 regularly spoke with my attorneys to make sure I was fully informed of the facts and settlement
8 negotiations.

8 8. Overall, I estimate that I have devoted 40-45 hours of my time to this case.

9 9. By agreeing to bring this class and representative action, I accepted the
10 responsibilities of representing the interests of the State of California as well as all similarly
11 situated employees and willingly chose to assume risks and potential costs associated with the
12 case. I did, and still do, have a fear that future employers may not hire me should they find out
13 that I served as a class representative Plaintiff in a wage and hour lawsuit. However, this is
14 another risk I am willing to take in order to further the interests of the case.

14 10. I am aware that NTT denies the allegations in this lawsuit and that there has been
15 no determination that NTT is actually liable for any of these alleged violations. I also understand
16 that there are many risks and uncertainties involved in continuing to pursue this case. I have been
17 advised of the terms of the proposed settlement of this case, and in light of the risks and
18 uncertainties in proceeding with the case, I believe the proposed settlement is fair and reasonable
19 and in the best interests of the class members.

19 11. I have requested a service award for my services as Named Plaintiff in the amount
20 of \$15,000.00. I believe that my request for this service award is fair and reasonable in light of the
21 amount of work I put into this case to ensure a good result as well as the risks (as mentioned
22 above) I took in serving as a Named Plaintiff.

23 I declare under penalty of perjury that the foregoing is true and correct under the laws of
24 the State of California. Executed on October 27, 2025 in the City of Los Angeles,
25 State of California.

26 *Robert Taylor*

27 MALIK AZIZ TAYLOR AKA ROBERT TAYLOR