

KINGSLEY & KINGSLEY, APC

ERIC B. KINGSLEY, Esq., Cal. Bar No. 185123

eric@kingsleykingsley.com

LIANE KATZENSTEIN LY., Esq., Cal. Bar No. 259230

liane@kingsleykingsley.com

ARI J. STILLER, Esq., Cal. Bar No. 294676

ari@kingsleykingsley.com

16133 Ventura Blvd., Suite 1200

Encino, CA 91436

Telephone: (818) 990-8300

Fax: (818) 990-2903

LAW OFFICES OF SAHAG MAJARIAN II

SAHAG MAJARIAN II, Esq., Cal. Bar No. 146621

18250 Ventura Blvd.

Tarzana, CA 91356

Telephone: (818) 609-0807

Fax: (818) 609-0892

Attorneys for Plaintiff Becerra and the Proposed Class
(Additional Counsel on Following Page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

STEPHEN BROUGH and EDGAR
BECERRA, individuals, on behalf of
themselves and others similarly situated

PLAINTIFFS,

v.

GLOBAL PARATRANSIT, INC.; REZA
NASROLLAHY, an individual, and DOES 1 to
50, inclusive,

DEFENDANTS.

Case No. BC616177; *Related Case* BC619163
[Case Assigned for All Purposes to Hon.
Carolyn B. Kuhl]

**DECLARATION OF EDGAR BECERRA
IN SUPPORT OF FINAL APPROVAL OF
CLASS SETTLEMENT**

Date: November 12, 2019

Time: 10:00 am

Dept.: 12

Complaint Filed: April 7, 2016

Consolidated Complaint: April 27, 2017

1 **MATTHEW NORTON & ASSOCIATES**

2 John Matthew Norton, Esq. Cal. Bar No. 158937

3 matt@matthew-norton.com

4 4105 E. Broadway, Ste. 190

5 Long Beach, CA 90803

6 Telephone: (562) 433-3208

7 **DEASON & ARCHBOLD**

8 Matthew F. Archbold, Esq. Cal. Bar No. 210369

9 matthew@yourlaborlawyers.com

10 David D. Deason, Esq. Cal. Bar No. 207733

11 david@yourlaborlawyers.com

12 17011 Beach Blvd., Suite 900

13 Huntington Beach, CA 92645

14 Telephone: (949) 794-9560

15 Attorneys for Plaintiff Brough and the Proposed Class

DECLARATION OF EDGAR BECERRA

I, EDGAR BECERRA, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the Named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant Global Paratransit, Inc.

3. In this action, I allege that Global Paratransit failed to pay all wages to myself and the other Class Members, in addition to other issues.

4. I brought this case on behalf of myself and other Global Paratransit, Inc. employees. I understand that I'm representing other employees and I believe that I'm able to represent them well.

5. I have worked to actively represent the other Class Members. I have been in regular contact with my attorneys throughout this case and have been kept apprised of all aspects of the case.

6. I first researched experienced attorneys and, once retained, I compiled relevant documents from my employment to assist my attorneys in litigating this case. Throughout the case, I have provided my attorneys with information for this lawsuit and for the Settlement as needed.

7. In the course of the case, Global Paratransit requested a lot of information from me. I provided my attorneys with the information and documents they needed to respond to Global Paratransit's requests, reviewed the responses to assure that they were accurate and verified the responses.

8. I also participated in multiple phone meetings with my attorneys.

9. I reviewed and signed the final settlement agreement and discussed next steps for the case with my attorneys.

10. I am prepared to continue assisting with this litigation and am committed to achieving the best possible results for the Class.

11. I believe that the Class Action Settlement obtained on behalf of the Class is fair and

1 reasonable in light of the issues involved in this case. I reviewed and discussed the Settlement
2 Agreement with my attorneys and asked them questions about it to ensure that I understood its
3 terms.

4 12. I believe that I have fairly represented the absent Class and have always kept the
5 Class Members' interests at heart.

6 13. I am not aware of any conflicts of interest that prevent me from being confirmed as
7 Class Representative in this lawsuit. I am not related in any way to my attorneys or to any other
8 member of the firm that is representing me. I have not been promised any money or inducement
9 to serve as Class Representative in this action.

10 14. It is my opinion that the settlement agreement provides for a fair and adequate
11 enhancement for me as a Class Representative, in the amount of \$5,000. I believe that this is fair
12 and reasonable in light of all of the work that I have performed in my role as Class Representative.
13 As Class Representative, I have actively participated in all stages of the litigation, as detailed
14 above, and have always maintained the best interests of the Class while performing my Class
15 Representative duties.

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15. It is also my opinion that the Class Representative enhancement is fair, reasonable, and adequate because, in addition to the many hours I spent participating in the prosecution of this case, I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we were unsuccessful in this lawsuit. Likewise, I risk the potential stigma of being a Class Representative in a class action labor dispute, which may affect my future employability.

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

Executed this 16 day of September, 2019 at 9:30pm,
California.

DocuSigned by:

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EDGAR BECERRA