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Attorneys for Plaintiff BRAD KLEIN

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF RIVERSIDE**

BRAD KLEIN, an individual, on behalf of  
himself and on behalf of all persons similarly  
situated,

Plaintiff,

v.

REDZONE SECURITY INC., a California  
Corporation; and DOES 1-50, Inclusive,

Defendant.

Case No. CVRI2202841

**DECLARATION OF BRAD KLEIN IN  
SUPPORT OF MOTION FOR FINAL  
APPROVAL OF CLASS ACTION AND  
PAGA SETTLEMENT**

Date: August 15, 2024  
Time: 8:30 a.m.

Judge: Hon. Harold W. Hopp  
Dept.: 1

1 I, BRAD KLEIN, declare as follows:

2 1. I am over the age of eighteen, a California resident, Plaintiff and Proposed Class  
3 Representative in the above-entitled matter. I submit this declaration in support of Plaintiff's Motion  
4 for Final Approval of Class Action and PAGA Settlement and in support of Plaintiff's Motion for Class  
5 Counsel Award and Class Representative Service Award. I have personal knowledge of all the facts  
6 stated herein. I could and would competently testify under oath to these facts in court if requested to do  
7 so.

8 2. I retained Class Counsel February 2022 and filed the lawsuit in July of 2022. I filed the  
9 case on behalf of myself and all persons who are or previously were employed by Defendant Redzone  
10 Security, Inc. ("Defendant") as a non-exempt employee in California during the period between July 11,  
11 2019, through January 11, 2024.

12 3. I worked for Defendant as a non-exempt employee in California from approximately  
13 September of 2021 to October of 2021. At all times during his employment, Plaintiff was subject to  
14 Defendant's written policies and procedures.

15 4. I filed the case because I believed my rights as an employee were violated by Defendant  
16 and also the rights of other employees that worked for Defendant. Among other claims, I believe  
17 Defendant failed to provide compliant meal and rest periods, failed to pay for all time worked, failed to  
18 reimburse necessary business expenses, and failed to furnish accurate, itemized wage statements.

19 5. Before I initiated the case as a plaintiff and Class Representative, I spoke at length with  
20 my attorneys. We discussed my work experience and how company policies were applied to me and  
21 other employees. I provided the attorneys with documents they requested. We reviewed the documents  
22 together and asked and answered many questions regarding my experience working for Defendant, the  
23 litigation process, and about class actions generally.

24 6. During these conversations, I learned about my responsibilities as a plaintiff in the lawsuit  
25 and as proposed a Class Representative. I understood that pursuing this action as a class action rather  
26 than merely seeking my individual claims substantially increased the risk to me. Those risks included  
27 the possibility of being held liable for Defendant's attorneys' fees and costs in a complex class action if  
28 I lost the case. I also understood that as a Class Representative, I would be under increased scrutiny by

1 the attorneys and the Court because I needed to prove that I was an adequate class representative.  
2 Further, I understood that I would lose some autonomy over my individual claims that I could not make  
3 decisions for my sole benefit and that I needed to make every litigation decision with the best interests  
4 of the Settlement Class in mind.

5 7. I also understood that pursuing this litigation created a very public record of my grievances  
6 with Defendant which produced the risk that a future employer could hold it against me that I sued a  
7 former employer.

8 8. I also knew that I was making a sacrifice in that I could have pursued my claims only on  
9 an individual basis, likely obtaining a recovery greater than the portion of the class settlement I stand to  
10 receive from this settlement. My attorneys explained to me that the net settlement value of my individual  
11 claims may be greater than my ultimate recovery from the net class settlement amount.

12 9. Notwithstanding these risks and sacrifices, I decided to go through with the case because  
13 I believed violations occurred and most employees would not know what their rights are and even if  
14 they did, they would be apprehensive to file a lawsuit against their employer for fear of retaliation.

15 10. During the lawsuit I communicated on a regular basis with my attorneys. I reviewed status  
16 updates from my attorneys and court filings on a regular basis, and spoke to my attorneys on the phone,  
17 because I wanted to keep up with developments in the case which I understood was one of my duties as  
18 a class representative.

19 11. **Review and Approval of Settlement:** I spoke with my attorneys regarding the settlement  
20 negotiations while they were ongoing. I also spoke with my attorneys regarding the settlement which  
21 was ultimately accepted. I was very satisfied with the terms of the settlement that was agreed to by the  
22 parties. When the settlement papers were ready, I again spoke with my attorneys and reviewed the  
23 settlement agreement which I signed on February 22, 2024.

24 12. **Participation:** Since I retained Class Counsel approximately two years ago, I have been  
25 actively involved with this class action lawsuit performing the duties described above. While I did not  
26 keep formal time records, I was in regular contact with my attorneys, attended hearings, reviewed  
27 important court filings, and spent considerable time on the issues presented during the litigation and in  
28 the settlement process. I estimate that I spent approximately 25 hours working on this case.

13. Also, my attorneys explained to me that the settlement process involved a two-step review by the Court to determine whether the settlement was fair before ordering that the settlement be funded and paid. I knew this process also involved notifying all class members of the settlement terms and of their rights to make a claim for their settlement share, to opt out of the settlement or to object to the settlement.

14. Ultimately, I believe I did the right thing in pursuing this case on behalf of the class who now stand to receive substantial monetary payments as a result of this case and settlement. I also believe that the requested Class Representative Service Award in the amount of \$10,000 from the settlement is fair compensation for the (1) the broad general release I executed, (2) the work I performed, (3) the sacrifices made not pursuing this case individually, and (4) the risks I undertook.

15. In light of all the time and effort I have spent on this case, the sacrifice I have made, the risks I undertook by suing a former employer, the exposure to being responsible for paying Defendant's costs in the event we did not win the case, and in light of the size of the settlement, I believe the request for \$10,000 as a service award is fair and reasonable.

16. As a Class Member, I expect to receive an estimated Individual Settlement Payment of \$20.78.

17. Further, I have reviewed the terms of the Settlement, including the monetary terms. I support my attorneys' application for a Class Counsel Award in the amount of \$81,666.67, comprised of \$66,666.67 for attorneys' fees (one-third of the Gross Settlement Amount) and up to \$15,000 for reimbursement of actually incurred litigation expenses.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 07/22/2024, at Desert Hot Springs, CA (Location/City), California.

By: Brad Klein  
Brad Klein (Jul 22, 2024 16:16 PDT)  
 BRAD KLEIN