





1 the prevalence of the practice.

2 4. I ultimately sacrificed my personal interests for the class' benefit. I decided to  
3 pursue legal action in order to force Defendant to change its business practices. I agreed to file a  
4 Complaint based upon the investigation and further discussions. I provided factual background  
5 (explaining my telephone interaction with Defendant as well as Defendant's telephone ordering  
6 system) for the class action Complaint. I reviewed and approved the Complaint and Amended  
7 Complaint before it was filed against Defendant, and the allegations therein are true and correct  
8 based on my information and belief. In-person meetings and various communications with Class  
9 Counsel regarding legal action and reviewing the Complaints took about six (6) hours.

10 5. I also took the time to review discovery responses from Defendant and all  
11 significant documents concerning Defendant's recording policies and practices provided to Class  
12 Counsel. I consulted with Class Counsel about the written materials. I routinely sent inquiries  
13 to Class Counsel about the status of the case. I spent about four (4) hours on these tasks.

14 6. I also assisted Class Counsel with preparing initial responses and supplemental  
15 responses to detailed written discovery directed to me. I was also required to gather documents  
16 to respond to the discovery that Defendant was requesting. I also gathered information and  
17 documents in support of the claims and responded to written inquiries from Class Counsel. This  
18 work was undertaken in order to assist Class Counsel with preparing the Complaint and  
19 Amended Complaint, opposing the Demurrer and Motion to Strike which was filed at the outset  
20 of the case, the anticipated Motion for Class Certification, the scheduled Mediation before  
21 Justice Panelli, and ultimately trial. I spent about eight (8) hours on these tasks.

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1           7.       I also prepared for and sat for a deposition taken by Defendant. I spent about  
2 seven (7) hours on these tasks.

3           8.       I was very involved in the settlement discussions. I kept informed of all  
4 developments, and fully reviewed the settlement agreement and amended settlement agreement,  
5 and various class notices. I have continued to keep informed about the settlement process. I  
6 believe that the settlement is fair and reasonable and that my efforts significantly attributed to  
7 Defendant changing its business practices of recording and monitoring customer service  
8 telephone calls in the State of California. Additionally, Class Members are being compensated  
9 for the statutory damages they suffered as a result of Defendant's former practice of recording  
10 and monitoring customer service telephone calls without providing any advance notice. I spent  
11 approximately four (4) hours on this process.

12           9.       I have spent approximately thirty-three (33) hours in acting as a class  
13 representative, and fulfilling those duties and obligations. I am a Quality Assurance Specialist  
14 and work for Amgen.

15           I declare under penalty of perjury under the laws of the State of California that the  
16 foregoing is true and correct. Executed this 12<sup>th</sup> day of February, 2018 at Woodland Hills,  
17 California.



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Yevgeniya Granina