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10	SUPERIOR COURT OF THE STATE OF CALIFORNIA	
11	COUNTY OF LOS ANGELES	
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13	JOEL PASNO, JOHN KUNTZ, and	CASE NO. 22STCV01361
14	RODELLA HURTADO , individually and on behalf of all others similarly situated,	DECLARATION OF JOEL PASNO IN
15	Plaintiffs,	SUPPORT OF PLAINTIFFS' MOTION FOR ORDER GRANTING FINAL APPROVAL OF
16	VS.	CLASS ACTION SETTLEMENT
17		Date: September 15, 2023
18	HIBU INC., a Delaware Corporation,	Time: 9:00 a.m. Dept 17
19	Defendant.	
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28	DECL OF IOEL DASNO 190	DIS'MOT FOR FINAL ADDOMAL
	DECL. OF JOEL PASNO ISO PLS.' MOT. FOR FINAL APPROVAL CASE NO. 22STCV01361	

I, Joel Pasno, declare as follows:

1. I am a named Plaintiff and putative Class Representative in this matter. I am over 18 years 2 of age. I have personal knowledge of the following facts and could and would testify competently to 3 them.

4 2 I was employed as a Sales Representative by Hibu in California from approximately April 2018 until November 2019. 5

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3 I first discussed my potential lawsuit with attorneys Julian Hammond and Polina Brandler 6 in November 2021. During our call, we discussed what it meant to act as a class representative; what my 7 potential claims against Hibu were; how I set up appointments with prospective clients in various parts 8 of my territory; the number of accounts I visited each day and where they were located; and how I spent 9 my time during the initial training period when I started working for Hibu including when my day started 10 and ended, and the assignments I had to complete at night such as preparing a presentation to give to the 11 class. That call lasted for approximately 45 minutes.

4. During our call, my attorneys asked me to look for documents relevant to my employment. 12 I spent approximately 2 to 3 hours going through my emails in search for relevant documents, and sending 13 them to my attorneys. The documents that I found and shared included my Hibu offer letter, Hibu 14 compensation policy, pay stubs, and a payroll register showing a detailed breakdown of each paycheck I 15 received from Hibu.

16 5. Thereafter, my attorneys sent me a draft Complaint to review and approve. After receiving 17 it, I had another 20-minute call with my attorneys about the facts included in the Complaint, carefully reviewed the Complaint, and approved it for filing. 18

6. In August 2022, my attorney Ari Cherniak sent me a list of documents that Hibu requested 19 from me including expense receipts and bank statements. I carefully reviewed this list and then had a 20 detailed discussion with Mr. Cherniak about the requested documents and about additional details of my 21 employment relevant to my claims.

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7. Shortly thereafter, Mr. Cherniak e-mailed me the details about the mediation, which was 23 scheduled for September 14, 2022. While I was unable to attend the mediation because I had to work that day, I made sure to remain available by phone throughout the day in case my attorneys needed to reach 24 me. On the afternoon of September 14, my attorneys emailed a Memorandum of Understanding to review 25 and sign, which I carefully reviewed and then signed. 26

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8. Mr. Cherniak subsequently sent me the Settlement Agreement to review, approve, and sign. I reviewed the Settlement Agreement, and discussed it with Mr. Cherniak before I approved and signed it.

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9. I also submitted a declaration in support of preliminary approval of the settlement. I
⁴ discussed the content of my declaration with Mr. Cherniak, and carefully reviewed it before signing it to
⁵ make sure it was accurate.

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10. In April 2023, Mr. Cherniak called me with an update on the changes the Court directed the parties to make to the Settlement, and sent me an Amended Agreement and a second declaration to review and sign.

8 11. Altogether, I spent approximately one hour reviewing and signing the two Settlement
9 Agreement and two declarations.

10 12. Since the initiation of my lawsuit nearly two years ago, I estimate that I have spent at least
 11 5.5 hours working on this case. That does not include additional time I may spend depending on the
 12 Court's ruling on this Motion, and any other issues that may require my involvement.

Bringing this lawsuit against Hibu was concerning to me because I feared that there would
 be negative repercussions for me with other employers in the industry and beyond. Specifically, I have
 been and am concerned that stepping up to bring these claims will impact my ability to get job offers with
 other employers. Nonetheless, I decided to bring this case to ensure that Hibu properly paid my fellow
 employees for their hours worked and properly reimbursed out-of-pocket expenses.

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I declare under penalty of perjury under the laws of the United States and the State of California that 8/17/2023 the foregoing is true and correct. Executed on

JOEL PASNO