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12 *Attorneys for Plaintiffs and the Putative Class*

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
 14 **COUNTY OF LOS ANGELES**

15 **JOEL PASNO, JOHN KUNTZ, and**
 16 **RODELLA HURTADO**, individually and on
 17 behalf of all others similarly situated,

18 Plaintiffs,

19 vs.

20 **HIBU INC.**, a Delaware Corporation,

21 Defendant.

CASE NO. 22STCV01361

22 **DECLARATION OF JOEL PASNO IN**
 23 **SUPPORT OF PLAINTIFFS' MOTION FOR**
 24 **ORDER GRANTING FINAL APPROVAL OF**
 25 **CLASS ACTION SETTLEMENT**

26 Date: September 15, 2023
 27 Time: 9:00 a.m.
 28 Dept 17

1 I, Joel Pasno, declare as follows:

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

5 2. I was employed as a Sales Representative by Hibu in California from approximately April
6 2018 until November 2019.

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

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

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

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

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

