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10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES**

12 JEROME DIVINITY, individually and on behalf
13 of all others similarly situated,

14 Plaintiff,

15 v.

16 PACIFIC 2.1 ENTERTAINMENT GROUP,
17 INC., a California Corporation; JAMES
18 KAPENSTEIN, an individual, and DOE 1
19 through and including DOE 10,

20 Defendants.

Case No. 20STCV32700
Assigned to Hon. Elihu M. Berle,
Dept. 6

**DECLARATION OF MICHAEL
GRAHAM IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: February 22, 2023
Time: 9:00 a.m.
Dept.: 6
Location: Spring Street Courthouse
312 N. Spring St.
Los Angeles, CA 90012

Complaint Filed: August 27, 2020

1 MICHAEL GRAHAM declares under penalty of perjury of the laws of the United States and the
2 State of California as follows:

3 1. I am over the age of 18 and am a resident of the State of California.

4 2. I was an employee of Defendant ABC Signature Studios, Inc. (“Defendant”) during the
5 relevant time period in this action. I make this Declaration in support of Plaintiff’s Motion for
6 Preliminary Approval of Class Action Settlement. I have personal knowledge of the factual matters set
7 forth in this Declaration, and if called as a witness, could and would competently and truthfully testify
8 thereto.

9 3. Since the filing of my case Graham v. ABC Signature Studios, Inc., in January of 2022,
10 and prior to filing, I have devoted a significant amount of time to my lawsuit including: conferences
11 with my attorneys and other employees; reviewing, analyzing, and explaining the compensation and
12 calculation policies and procedures; and collecting and reviewing documents.

13 4. I have reviewed and am generally familiar with the Complaints in my case, as well as the
14 Settlement Agreement.

15 5. My motivation in filing this lawsuit has always been to see that Defendant pays what
16 is owed to its employees. I am participating in this case to pursue my claim for myself and for others
17 in order to recover the requested relief. I am neither being compensated by my attorneys nor have I
18 been offered or promised any compensation or other financial incentive for my participation or
19 assistance in this action. My motive in pursuing this case has been to collect reasonable damages and
20 penalties for the Class. I understand that I have a fiduciary obligation to others and I will not put my
21 financial interest over the interests of the Class.

22 6. I believe that the terms of the Settlement Agreement are fair, adequate, and
23 reasonable. Before signing, I had an opportunity to review its terms in detail, and I thoroughly
24 reviewed and discussed these terms with Harris & Ruble. I understand that the Settlement
25 Agreement is the product of the formal mediation sessions. Although I have spent considerable time
26 working on this lawsuit—including, again, discussing my claims with my attorneys, and explaining
27 Defendant’s policies and practices to them, my motivation has always been to see that Defendant
28 pays what is owed to its employees.

8. I am participating in this case to pursue my claim for myself and for others in order to recover the requested relief. I am neither being compensated by my attorneys nor have I been offered or promised any compensation or other financial incentive for my participation or assistance in this action. My motive in pursuing this case has been to collect reasonable penalties for all concerned.

9. I am not aware of any conflicts of interest or inconsistencies between myself and any of the attorneys I have retained or any of the other Class Members. When I have spoken with my counsel, he has always provided detailed answers to questions I had regarding my case. I believe that with respect to my payment of wages I am typical of the other employees.

10. I have actively participated in this litigation by conferring with counsel and assisting in gathering information and documents for the prosecution of the lawsuit. I have spent a considerable amount of time conferring with Counsel, providing factual background and support, analyzing and providing data, and consulting Counsel before, during and after a full-day mediation in this case. I aided in the preparation of the Complaint in January of 2022 by reviewing the facts of the case with Harris & Ruble. I had numerous phone calls with Harris & Ruble throughout the proceedings. I aided Harris & Ruble with regard to informal discovery, and I was involved and aware of the extensive negotiations that took place over the terms of this settlement.

I have read the foregoing, and the facts set forth therein are true and correct of my own personal knowledge. Executed this 21st day of December, 2022, in the County of Los Angeles, State of California.

DocuSigned by:

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Michael Graham

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PROOF OF SERVICE

I am an attorney for the plaintiffs herein, over the age of eighteen years, and not a party to the within action. My business address is Harris & Ruble, 655 N. Central Ave., 17th Floor, Glendale CA, 91203. On December 22, 2022, I served the within documents:

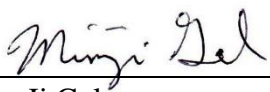
DECLARATION OF MICHAEL GRAHAM IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Electronic Service: I caused the above-entitled document(s) to be served through Case Anywhere addressed to all parties appearing on the electronic service list for the above-entitled case and on the interested parties in this case:

Stephen L. Berry (SBN 101576)
Blake Bertagna (SBN 273069)

PAUL HASTINGS LLP
695 Town Center Dr. 17th Fl.
Costa Mesa, CA 92626
Tel: (714) 668-6200
Fax: (714) 668-6346

I declare under penalty of perjury that the above is true and correct. Executed on December 22, 2022, at Los Angeles, California.



Min Ji Gal