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EDDIE DURON
8

9 **UNITED STATES DISTRICT COURT**
10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
11

12 SILVIA VALDIVIA DE CABRERA,
an individual, on behalf of herself and
13 all others similarly situated,

14 *Plaintiff,*

15 vs.

16 SWIFT BEEF COMPANY, a Delaware
17 corporation,

18 *Defendant.*
19

Case No. 5:18-cv-02551-(PSG)-(Ex)

Honorable Philip S. Gutierrez

**DECLARATION OF EDDIE
DURON IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Information

Date: November 16, 2020
Time: 1:30 p.m.
Place: Courtroom 6A, 6th Floor
Judge: Hon. Philip S. Gutierrez

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DECLARATION OF EDDIE DURON

I, EDDIE DURON, declare and state as follows:

1. The following facts are stated from my personal knowledge, except those facts stated on information and belief, which I believe to be true and correct, and if called as a witness, I could and would testify competently thereto under oath.

2. I am a class representative in this action against Defendant Swift Beef Company (“Defendant”).

3. I understand that, as a class representative, I have certain duties and responsibilities to the class, and I believe that I have fairly represented the interests of all class members during the entire course of this action.

4. I worked for Defendant in an hourly position in the State of California during the relevant Class Period.

5. I have considered the interests of the Settlement Class as I would consider my own interests, have put the interests of the Settlement Class before my own interests by retaining experienced counsel and carefully considering the impact that the Settlement in this case would have on them, and I understand that the Settlement in this case is subject to this Court’s approval to ensure that it is in the best interest of the class as a whole.

6. I have spent a considerable amount of time on this case. The activities I have spent this time on include, but are not limited to: (1) retaining experienced counsel, (2) providing them with extensive experience about my work history with Defendant and Defendant’s policies and practices, (3) time spent being actively involved in the settlement process to ensure a fair result for the Settlement Class as a whole.

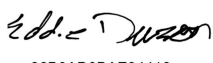
7. I understand that my attorneys are submitting an application to this Court for an enhancement award to compensate me for my unique contribution to the success of this action in the amount of \$5000. I believe this amount is fair and reasonable compensation for my efforts in this case and the risks I have taken in

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pursuing a fair recovery for the Settlement Class. There is now a public record that I served as a class representative in a wage and hour case. By filing this case I became potentially responsible for paying Defendant’s costs.

I declare under the penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct to the best of my knowledge.

Executed on September 24, 2020 in Moreno Valley, California.

DocuSigned by:

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EDDIE DURON