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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF LOS ANGELES**

13 LARRY TRAN, on behalf of himself and all) Case No.: BC717323
14 others similarly situated,)
15 Plaintiff,) **DECLARATION OF LARRY TRAN IN**
16 v.) **SUPPORT OF MOTION FOR FINAL**
17 FASTENAL COMPANY (d/b/a Fastenal);) **APPROVAL OF CLASS ACTION**
and DOES 1 through 100, inclusive,) **SETTLEMENT, AND FOR AWARD OF**
18 Defendants.) **ATTORNEY'S FEES AND COSTS TO CLASS**
19) **COUNSEL AND INCENTIVE AWARD TO**
) **THE CLASS REPRESENTATIVE**

HEARING
Date: October 14, 2020
Time: 10:00 a.m.
Dept.: 7
Judge: Hon. Amy D. Hogue

1 **DECLARATION OF LARRY TRAN**

2 I, Larry Tran, declare as follows:

3 1. I am the named Plaintiff in the above-entitled action and I make this Declaration in
4 support of the Motion For Final Approval Of Class Action Settlement, And For Award Of
5 Attorney's Fees And Costs To Class Counsel And Incentive Award To The Class Representative.

6 2. I have personal knowledge of the matters stated herein, except those matters stated
7 upon information and belief and, as to those matters, I believe them to be true.

8 3. In August 2018, I made a purchase from a Fastenal store located at 5380 E.
9 Washington Blvd., Commerce, California. I paid for my purchase with my credit/debit card. I
10 was provided at the point of sale with an electronically-printed customer receipt which has my
11 card's expiration date and first four and last four digits of my card number printed on the receipt.

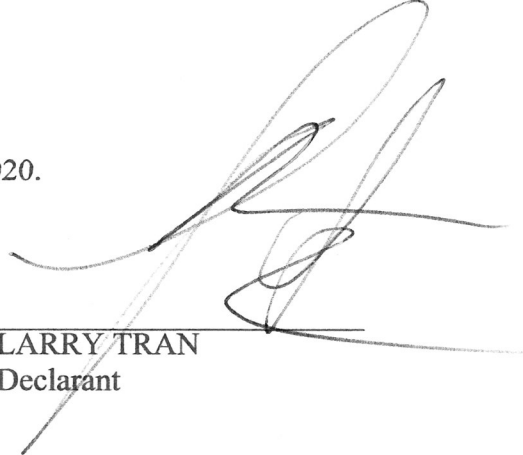
12 4. To my knowledge, there are no conflicts of interests between myself and other
13 Settlement Class members which should or would preclude me from serving as their
14 representative in this case. I am not aware of any legal or factual issues relevant to these
15 proceedings which differ from those confronting other proposed Settlement Class members
16 generally.

17 5. To date, I believe I have done everything that can be reasonably expected of me to
18 fairly, adequately and vigorously pursue and protect the interests of the class. I regularly and
19 consistently communicated with Mr. Yedalian throughout the time this lawsuit was pending. I
20 reviewed relevant documents, provided my input, and otherwise kept apprised of litigation related
21 events and developments. I provided my ideas and input to Mr. Yedalian in the various rounds of
22 settlement negotiations and exchanges. I travelled from San Diego to San Francisco and
23 participated, in-person, at the mediation before Mr. Martin Quinn of JAMS in San Francisco on
24 March 1, 2019. Moreover, by stepping forward to shoulder this matter on behalf of the class, I
25 assumed and was subjected to the risk of liability for defense costs in the event the litigation was
26 unsuccessful, and I also took on other risks, including the risk of subjecting myself to intrusive
27 discovery. I estimate that I devoted approximately 45-50 hours of my time to pursue this matter in
28 an effort to advance the interests of the entire class.

1 6. I will continue to participate in this lawsuit, and will do all things required of me to
2 fairly, adequately and vigorously pursue and protect the interests of the Settlement Class.

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4 I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct.

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7 Executed this 24 day of August 2020.



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10 LARRY TRAN
11 Declarant

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