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9 Attorneys for Plaintiffs

10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
11 **COUNTY OF MERCED**

12 LISA HAGGERTY and CHRIS SWEARINGIN,  
13 on behalf of themselves and all others similarly  
14 situated,

15 Plaintiffs,

16 vs.

17 CONSUMER SAFETY TECHNOLOGY, LLC  
18 d/b/a INTOXALOCK and DOES 1 - 10,  
19 inclusive,

20 Defendants.

Case No. 22CV-01414

*Assigned for All Purposes to Hon. Stephanie  
L. Jamieson, Courtroom 8*

**DECLARATION OF CHRIS SWEARINGIN  
IN SUPPORT OF UNOPPOSED MOTION  
FOR FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT, ATTORNEYS'  
FEES AND EXPENSES, ADMINISTRATION  
COSTS, AND CLASS REPRESENTATIVE  
SERVICE AWARD**

Hearing Date: March 3, 2025

Hearing Time: 8:15 a.m.

Courtroom: 8

Complaint Filed: May 18, 2022

Trial Date: None Set

**DECLARATION OF CHRIS SWEARINGIN**

I, Chris Swearingin, respectfully declare as follows:

1. I am over 18 years of age and a resident of California. I am the class representative in the above-captioned case, *Haggerty et al. v. Consumer Safety Technology, LLC d/b/a Intoxalock*, Merced County Superior Court Case No. 22CV-01414. I have personal knowledge of the facts stated herein and if called as a witness I could and would competently testify thereto.

2. I make this declaration in support of Plaintiff's Unopposed Motion for Final Approval of Class Action Settlement, Attorneys' Fees and Expenses, Administration Costs, and Class Representative Service Award.

3. Prior to agreeing to be a class representative, my counsel provided me with information regarding class actions, how they work, and what my duties would be as a class representative. I agreed to serve as a class representative in this case so that I could seek damages on behalf of not just myself but also on behalf of other individuals in California who I allege, like me, had their privacy invaded by Defendant's call recording practices.

4. As part of becoming the class representative, I understood that I have a fiduciary duty to the class members. My duties were explained to me by my attorneys. I was aware that serving in this role required me to monitor the progress of the lawsuit, and actively participate as necessary or required, including responding to written discovery and possibly giving deposition and trial testimony. I understood that I might have to miss time from work to perform these duties. I still agreed to serve as the class representative to recover damages allegedly suffered by myself and the other class members.

5. Since initiating this lawsuit, I have considered the interests of the other class members just as I would consider my own interests and have understood that I must put the interests of the class members before my own interests. I am not aware of any interests that I have that are contrary to the interests of the other class members and I do not know of any conflicts of interest that would keep me from adequately representing them.

6. Throughout the course of the lawsuit, I have spent the time necessary to speak with my attorneys at Greenstone Law APC regarding the case and fulfilling my responsibilities as a class representative. I have had numerous, extensive discussions with my attorneys regarding Defendant's practices and how Defendant operates, as well as my experiences with Defendant.



7. Throughout my involvement in this case, I have routinely checked in with my attorneys and their staff to monitor the status of the case. I also promptly responded to inquiries from my attorneys throughout the case and provided additional information as needed for the case. I spoke with my attorneys before mediation and attempted to provide any help I could on the case to prepare for settlement negotiations. I kept in contact with my attorneys throughout the mediation and settlement process. I will continue to actively participate in this lawsuit and monitor the case until it is finalized.

8. When the case settled, I reviewed the Settlement Agreement and discussed its terms with my attorneys. I believe that the Settlement is fair and reasonable in light of the issues presented by this case, including the risks of continued litigation.

9. I fully understand the reputational risk I faced in serving as a class representative in a public lawsuit. I decided to put my own interests aside and bring a lawsuit that would be beneficial not just for myself, but for all of the class members. I have not received any benefit in exchange for serving as a class representative, nor for the help I provided to my attorneys.

10. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the other class members. I think that my efforts helped achieve the results obtained in this case.

11. Accordingly, I respectfully request that the Court award me the class representative service award in the amount of \$5,000.00 in recognition of the benefit I helped obtain for the other class members, the reputational risk that I assumed, and my active participation in this case.

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

Executed on January <sup>30</sup>\_\_\_\_, 2025 at Madera, California.

DocuSigned by:  
Chris Swearingin  
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Chris Swearingin