

**IN THE CIRCUIT COURT OF DUPAGE COUNTY
EIGHTEENTH JUDICIAL CIRCUIT**

DAVID BAMBERG, *individually and on
behalf of all others similarly situated,*

Plaintiff,

v.

DYNAMIC MANUFACTURING, INC.,

Defendant.

Case No. 2023LA000015

Hon. Timothy McJoynt

**DECLARATION OF DAVID BAMBERG IN SUPPORT OF PLAINTIFF’S UNOPPOSED
MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND
UNOPPOSED MOTION FOR ATTORNEYS’ FEES, COSTS, EXPENSES, AND
INCENTIVE AWARD**

I, David Bamberg, hereby declare as follows:

1. I am an adult over the age of 18 and a resident of the State of Illinois. I am the Class Representative in the lawsuit entitled *Bamberg v. Dynamic Manufacturing, Inc.*, Case No. 2023LA000015, currently pending in the Circuit Court of DuPage County. I make this Declaration in support of (i) the Motion for Final Approval of Settlement, and (ii) the Motion for Attorneys’ Fees, Costs, Expenses, and Incentive Award. The statements made in this Declaration are based on my personal knowledge and, if called as a witness, I could and would testify thereto.

2. I am a current employee of Dynamic Manufacturing, Inc. (“Defendant”) and began working for Defendant at one of its facilities in or around May 2017.

3. During my employment with Defendant, I used a handprint scanning system to clock in and out of work.

4. I assisted with the litigation of this case by detailing my employment history with Defendant and my experience with the handprint scanning clocking system. I also provided my lawyers with documentation regarding the same.

5. I also worked with my attorneys to prepare the Class Action Complaint. I carefully reviewed the Class Action Complaint for accuracy and approved it before it was filed.

6. During the course of this litigation, I kept in regular contact with my lawyers. Specifically, I conferred with them regularly by phone and e-mail to discuss the status of the case. We also discussed case strategy, anticipated motions, anticipated document and deposition discovery, and the prospects of settlement. Furthermore, when appropriate, I informed my attorneys of additional facts for their research and consideration.

7. I was prepared to testify at deposition and trial, if necessary.


8. My lawyers have kept me well informed in regard to the efforts to resolve this matter. They promptly communicated settlement offer to me and coordinated with me in advance of mediation. I also discussed the Class Action Settlement Agreement with them and gave my approval prior to signing it.

9. Based on the interactions and my relationship with my attorneys, I believe they have fairly and adequately represented me and the Settlement Class and will continue to do so.

10. Throughout this litigation, I understood that, as a Class Representative, I have an obligation to protect the interests of other Settlement Class Members and not act just for my own personal benefit. I do not have any conflicts with other Settlement Class Members. I have done my best to protect the interests of other Settlement Class Members and will continue to fairly and adequately represent the Settlement Class to the best of my ability.

11. The above statements are of my own personal knowledge, and I make such statements under penalty of perjury under the laws of Illinois and the United States of America.

Executed May 5, 2023 at Chicago, Illinois.


David Bamberg (May 5, 2023 15:20 CDT)

DAVID BAMBERG