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Case #24CV448267
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7 *Attorney for Plaintiff and Proposed Class*

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF SANTA CLARA**

10 **RAJ KUMAR SINGH PARIHAR**, on behalf
11 of himself and all others similarly situated,

11 Plaintiff,

12 v.

13 **MIPS HOLIDNG, INC.,**

14 Defendant.

Case No. 24CV448267

Assigned for all purposes to the Honorable
Theodore C. Zayner, Dept. 19 (Complex)

Complaint Filed: September 26, 2024

Trial Date: Not Set

16 **DECLARATION OF PLAINTIFF RAJ KUMAR SINGH PARIHAR**

17 I, Raj Kumar Singh Parihar, declare under penalty of perjury the following:

18 1. I am a named Plaintiff in the above-captioned litigation. I reside in San Jose,
19 California. And I submit this declaration in support of Plaintiff’s Unopposed Motion For
20 Preliminary Approval of Class Action Settlement. I have personal knowledge of the facts set forth
21 in this declaration and could testify competently to them if called upon to do so.

22 2. On or around September 18, 2024, I received notice of the Data Incident concerning
23 MIPS Holding, Inc. After I received notice, I conducted some research concerning the Data
24 Incident and ultimately sought out and spoke with experienced attorneys to determine if I would
25 retain them to handle my case. My attorneys spent significant time communicating with me about
26 the facts of this case and the law, including what was involved in being a class representative. In
27

1 the end, I decided to vindicate not only my own rights, but also those of others affected by the
2 Data Incident—by serving as a Plaintiff and proposed class representative in this class action
3 lawsuit. Instrumental in my decision to be a class representative was my own desire to provide
4 recourse to a proposed Class of other individuals whose personal information was compromised
5 in the Data Incident. Since agreeing to serve as a Plaintiff, I have diligently and faithfully fulfilled
6 my obligation, and I was instrumental in achieving the relief obtained for the Class.

7 3. I have participated in this litigation from its inception through settlement
8 discussions. I have been in regular contact with my attorneys during the course of this matter. I am
9 familiar with the work involved in prosecuting this action and have worked with my attorneys to
10 obtain the relief provided by the settlement. Throughout this litigation, I made myself available to
11 discuss developments in the case as part of my duty as a Class Representative. All in all, I have
12 devoted much time and attention to this case.

13 4. I have fairly represented the absent Class members and herein request that the Court
14 approve this settlement. I have maintained the best interests of the Class while performing my
15 class representative duties and I am unaware of any conflicts that would prevent me from serving
16 as a class representative.

17 5. Class Counsel have fairly and adequately represented the interests of the Class and
18 have demonstrated their valuable experience and qualifications in conducting the pending
19 litigation. They are experienced in prosecuting class actions such as this and have successfully
20 prosecuted numerous class actions in recent years, recovering hundreds of millions of dollars for
21 class members across the country. They have continued to provide fair and vigorous representation
22 for the Class in this matter.

23 6. By serving as a Class Representative in this action, I bore a certain amount of risk
24 that other Class members did not bear. In addition to the time I spent participating in the
25 prosecution of this case, I took a risk by coming forward and filing this class action, putting my
26 personal information into the public sphere. I was willing to participate in this case through the
27 discovery process, depositions, and through trial if there had not been a settlement. As a result of

1 my stepping forward and conducting a pre-suit investigation, Class members will receive the
2 benefits of the settlement to compensate them for the injuries directly and proximately caused by
3 Defendant's failure to implement or maintain adequate data security measures to safeguard
4 sensitive personal information from unauthorized access and disclosure.

5 7. In total, I have dedicated at least fifty (50) hours to my responsibilities as a Class
6 Representative. Among other things, I have spent time, (i) speaking with and communicating with
7 my attorneys; (ii) researching the facts of the Data Incident; (iii) researching my rights and those
8 of the Class in bringing this lawsuit; (iv) gathering documents and information requested by my
9 attorneys; (v) reviewing documents filed in this action; and (vi) responding to numerous questions
10 (about the Data Incident and the Class Settlement) from other Class Members who contacted me
11 after seeing that I was the named Plaintiff in this lawsuit.

12 8. I undertook significant risks by serving as a Class Representative—including, but
13 not limited to, the risk of backlash from my former employer. I did not receive any “personal
14 benefit” from pursuing this litigation. In fact, serving as a Class Representative has been stressful
15 and consumed a significant amount of time (that I otherwise would have dedicated to work or
16 leisure).

17 9. Based on the foregoing, I respectfully request that this Court award me a Service
18 Award of \$3,000.

19 Pursuant to 28 U.S.C. § 1746, I declare and sign under penalty of perjury of the United
20 States of America that the foregoing is true and correct.

21
22 Executed on July 21, 2025 in San Jose, CA
City State

23
24
25 
/s/ _____
26 Raj Kumar Singh Parihar
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