

1. I am the plaintiff in this action. I have personal knowledge of the facts herein, and if called as a witness, would testify thereto.
2. I reside in Austin, Texas. I currently work as an attorney at The Law Office of Karen Crawford where I practice immigration law. I worked for Invesco

as an Operations Representative in its Houston, Texas office from August 2013 to May 2015.

3. I submit this declaration in support of final approval of the \$3,470,000.00 Settlement, the Plan of Allocation, and the award of expenses incurred by my counsel in litigating this case and an award of attorneys' fees of 33% of the Settlement Amount.<sup>1</sup> I also submit this declaration in support of my request for a \$5,000 Incentive Award for the time I spent monitoring and participating in this Litigation.

4. During the Class Period, I participated in the Invesco 401(k) plan (the "Plan").

5. I have spent approximately 30 hours performing actions that benefitted the proposed Class at large, including furnishing Invesco's Plan Disclosure Statement, the Summary Plan Description, and my 401(k) account statements to attorneys at Robbins Geller Rudman & Dowd LLP ("Robbins Geller"), and discussing the Plan and its investment options. I reviewed the initial complaint and amended complaint, the briefing associated with Defendants' motion to dismiss, the Court's Order on the motion to dismiss, and other case

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<sup>1</sup> All capitalized terms herein have the same meanings as ascribed to them in the Amended Settlement Agreement, dated April 1, 2020.

documents. I participated in numerous telephone calls and corresponded with Class Counsel regarding the Litigation, particularly about the Settlement discussions and other important developments.

6. Since I became involved in the Litigation, I assisted Robbins Geller with its investigation of the ERISA class action claims. Robbins Geller consulted with me throughout the case on a variety of issues relating to the Plan's investment options, the status of the Litigation, and settlement negotiations. I stayed updated on case developments throughout the process.

7. I have authorized my counsel to settle this action for \$3,470,000. Before doing so, I reviewed, considered, and discussed the merits of this case with my counsel, was kept apprised of the scheduling and progress of the case, and understood the risks and benefits of the decision to settle the Litigation. I believe that the Settlement is an excellent recovery for the proposed Class and would not have been possible without counsel's diligent efforts. I believe the Settlement provides a fair, reasonable, and adequate recovery on behalf of the proposed Class, and that its approval is in the best interest of the proposed Class Members.

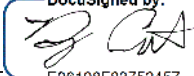
8. While I recognize that the Court will determine the appropriate fee, I have approved the request for expenses and an attorneys' fee award of 33% of the Settlement Amount. In concluding that the proposed fee and expense award was

reasonable, I considered the quality and diligence with which Class Counsel prosecuted this Litigation and the significant percentage of damages that the Settlement recovers.

9. Additionally, I understand that in cases like this, the Court can award a reasonable amount to a representative serving on behalf of the Class. I submit that the effort I expended in this case warrants a \$5,000 Incentive Award.

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

Executed on this 26th day of June 2020 in Austin, Texas.

DocuSigned by:  


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DIEGO CERVANTES

**CERTIFICATE OF SERVICE**

I hereby certify that on July 2, 2020, I electronically filed the above document with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to all registered counsel.

By: s/ John C. Herman  
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