

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT**

RIGOBERTO SANDOVAL,	:	Civil Action
individually and as a representative of a class of	:	No. 3:17-cv-1573-MPS
similarly situated plan participants and	:	
beneficiaries, on behalf of the	:	
EXELA 401(k) PLAN,	:	
the successor-in-interest of the	:	
NOVITEX ENTERPRISE SOLUTIONS	:	
RETIREMENT SAVINGS PLAN,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
EXELA ENTERPRISE SOLUTIONS, INC.,	:	
NOVITEX ENTERPRISE SOLUTIONS	:	
EMPLOYEE BENEFITS COMMITTEE	:	
and DOES NO. 1-10, Whose Names Are	:	
Currently Unknown,	:	
	:	
	:	
Defendants.	:	August 3, 2021
	:	

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**DECLARATION OF RIGOBERTO SANDOVAL**

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I, Rigoberto Sandoval, hereby declare under penalty of perjury under the laws of the United States and the State of California, as follows:

1. I am the Plaintiff and Class Representative in this action (“Action”), which I commenced by filing the initial complaint on September 20, 2017. I was a participant in the Novitex Enterprise Solutions Retirement Savings Plan (the “Novitex Plan”) until it was terminated and its assets merged with the SourceHOV 401(k) Plan at the end of 2018 to form the Exela 401(k) Plan (the “Exela Plan”), of which I became a participant.

2. Prior to the filing of the initial complaint in this action, I provided information to Class Counsel regarding the Novitex Plan and assisted Class Counsel in drafting the initial

complaint.

3. During the course of this litigation, I participated in regular conference calls with my counsel (in excess of 12) and reviewed court documents in order to stay apprised of developments in the litigation and fulfill my responsibilities to the Class. In addition, I answered discovery requests seeking information about my participation in the Novitex Plan and my suitability as a representative of the Class, among other subjects.

4. Prior to the parties' agreement to settle this Action, Defendants served me with a deposition notice and I began to prepare for my anticipated deposition. Moreover, I was prepared to attend trial – and testify, if called upon – as well as any other proceedings necessary to fulfill my responsibilities to the Class.

5. The parties reached agreement to settle this Action after a lengthy mediation and negotiations that continued over the ensuing weeks. I was available throughout the mediation and communicated regularly with Class Counsel as the parties negotiated the terms of the Settlement Agreement.

I declare under penalty of perjury that the foregoing is true and correct. Executed  
This 2 day of August, 2021 at Simi Valley, California.

DocuSigned by:  
*Rigoberto Sandoval*  
/s/ 7AA0B3C47CD0467...  
Rigoberto Sandoval