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Attorneys for Plaintiffs Ahmir Ringo and Kawna Anderson

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

PENNY A. SCOTT, on behalf of herself and
other similarly-situated employees,

Plaintiff,

vs.

BLACKSTONE CONSULTING, INC., a
California Corporation; and DOES 1 Through
10, inclusive,

Defendants.

CASE NO. 21CV1470 MMA (KSC)

CLASS ACTION

**DECLARATION OF KAWNA
ANDERSON IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: July 10, 2023
Time: 2:30 p.m.
Judge: Michael M. Anello
Ct. room: 3D (3rd Floor)

Complaint filed: May 21, 2021
Removal Date: August 18, 2021
Trial date: Not set

DECLARATION OF KAWNA ANDERSON

I, **Kawna Anderson**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in *Anderson v. Blackstone Consulting, Inc.*, Los Angeles Superior Court Case No. 22STCV31450 (“*Anderson Class Action*”) and *Anderson v. Blackstone Consulting, Inc.*, Los Angeles Superior Court Case No. 22SMCV01667 (“*Anderson PAGA Action*”), which are being resolved along with the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendant Blackstone Consulting, Inc. (“Defendant”) as an hourly-paid Security Officer from approximately July 2019 to February 2022. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant paid me and other employees what was owed to us and stopped its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 6 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 8 hours discussing my situation, complex wage-and-hour class action and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and PAGA representative.

3. Since becoming involved in the *Anderson Class Action* and *Anderson PAGA Action*, I have spent over 18 hours meeting and communicating with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering their questions, providing guidance regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least 12 additional hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendant.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about 2 hours reviewing the settlement agreement and about 1 hour asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. 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 class. I think my efforts helped to get the result obtained in this case, and as a class and PAGA representative, I respectfully request that the Court award me a service award in the amount of \$10,000.00 for my active participation in the case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

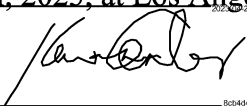
7. I am not related to anyone associated with Lawyers *for* Justice, PC.

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as a service award, as well as my share of the settlement as a class member.

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

04/25/2023

Executed this _____ day of April, 2023, at Los Angeles, California.


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Kawna Anderson