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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

CANDACE EVANS, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

BIG JOE HANDLING SYSTEMS INC., an
unknown business entity; BIG JOE
CALIFORNIA NORTH, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: RG20055273

Honorable Brad Seligman
Department 23

CLASS ACTION

**DECLARATION OF CANDACE EVANS
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Plaintiff's Motion for Preliminary Approval
of Class Action Settlement; Declaration of
Proposed Class Counsel (Alexandra Rose);
and [Proposed] Order filed concurrently
herewith]

Reservation ID: 926300367352
Date: May 10, 2022
Time: 3:00 p.m.
Department: 23

Complaint Filed: February 20, 2020
FAC Filed: May 22, 2020
Jury Trial Date: None Set

DECLARATION OF CANDACE EVANS

I, **Candace Evans**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in 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 Big Joe California North, Inc., doing business as Big Joe Handling Systems (erroneously sued as Big Joe Handling Systems, Inc.) (“Big Joe”) as an hourly-paid, non-exempt employee from approximately January 2019 to approximately September 2019. I decided to seek legal advice about my work experiences with Big Joe and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there, including Arby Aiwazian. I wanted to do whatever I could to make sure Big Joe 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 complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 7 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 6 hours discussing my situation, complex wage-and-hour class actions 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. I have spent over 15 hours communicating with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Big Joe, reviewing documents with my attorneys, answering questions and providing guidance regarding the duties of hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from

1 Big Joe. I routinely checked in with my attorneys and their staff to make sure that they had all of
2 my most current information and any additional information that I had obtained.

3 4. Throughout the case, I was available to answer any questions my attorneys had,
4 and available to speak and meet with my attorneys whenever they needed me. I responded to
5 them as quickly as possible and gave them as much information and identified as many
6 documents as I could. I spent at least 10 additional hours speaking with my attorneys about the
7 case, identifying potential witnesses, providing my attorneys with documents and information
8 concerning the case, and also describing policies, practices, and procedures of Big Joe. During
9 the discovery phase of the litigation, I spent approximately 5 additional hours reviewing Big
10 Joe's discovery requests, locating documents, and providing documents, responses, and
11 objections to my attorneys.
12

13 5. As far as the settlement is concerned, I was available to review documents and
14 answer any questions my attorneys had. I spent about 4 hours reviewing the settlement
15 agreement and about 3 hours asking questions and discussing the potential settlement with my
16 attorneys before signing the settlement agreement.
17

18 6. I believe that I have done everything that my attorneys have asked of me and have
19 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
20 and the State of California. I think my efforts helped to get the result obtained in this case, and
21 as a class and PAGA representative, I respectfully request that the Court award me an
22 enhancement payment in the amount of \$7,500.00 for my active participation in this case.
23 Taking into consideration the time that I have dedicated to this case, I believe that this amount is
24 reasonable.
25

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

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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 an enhancement payment, as well as my share of the settlement fund as a class member and as an aggrieved employee.

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

1/21/2022

Executed this ____ day of January 2022, at Eldon, Missouri.

Electronically Signed: 2022-01-21 15:10:03 UTC - 172.56.12.71
Candace Evans
Nintex AssureSign® 93d78814-51c1-4dee-a29b-a6220002ac01

Candace Evans