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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA

VICTORIA TICE, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

TRADER JOE'S COMPANY, a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 20CV00892

[Assigned to the Honorable Thomas P. Anderle,
Department 3]

**DECLARATION OF VICTORIA TICE IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: September 6, 2023

Time: 10:00 A.M.

Dept.: 3

Complaint Filed: February 14, 2020

DECLARATION OF VICTORIA TICE

I, Victoria Tice, declare as follows:

1. I am an individual over the age of 18 years old and am a resident of California. I am the named Plaintiff in this matter. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I worked for Defendant Trader Joe's Company ("Defendant") from about 2011 until on or about January 27, 2020.

3. When I was terminated from employment, I was issued a paycard from which I was told I could access my final wages. I did not agree to being paid through this method, nor did I authorize Defendant to pay my wages via paycard at any time during my employment.

4. I was charged a fee to use the paycard and, as such, have been unable to access all wages paid to me.

5. During the pendency of this lawsuit, I was required to provide assistance to my attorneys, including discussing the lawsuit with my attorneys providing them with documents and information, and reviewing the pleadings and settlement agreement. On June 9, 2021, I sat for my deposition in this case. I spent significant time with my attorneys discussing the deposition process and preparing for it. I also reviewed and responded to written discovery sent by the company. I estimate that throughout the pendency of the case I have spent between 30-35 hours assisting my attorneys in litigating the case. Throughout this case, I have continuously been kept apprised of the status of this case.

6. I understand that this action was brought on behalf of other employees in the State of California, and that I am acting as a representative for the Class. As the Class Representative, I understand that it is my responsibility to act in the best interests of the Class and not my own. I agree that I will not put my own interests ahead of that of the Class. Moreover, I am not aware of any conflicts that exist between my interests and the interests of the Class that would impair or affect my ability to serve as representative for the Class.

7. I have and continue to be willing to assist in the investigation of this matter, as well as making myself available for trial or any further proceedings in this matter as required to

1 represent the interests of the Class. I also understand my duties and responsibilities to the
2 proposed Class and will carry out those duties as necessary.

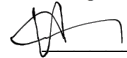
3 8. I have discussed the terms of the Joint Stipulation of Class Action Settlement
4 (“Settlement Agreement”) with my attorneys, and based on the information provided, I believe
5 the settlement to be fair, adequate, and reasonable for myself and for the entire Class.

6 9. I understand that I could have been liable for Defendant’s legal costs had
7 Defendant prevailed. I also understand that this lawsuit was filed in the public court records,
8 which could be viewed by future employers.

9 10. I also executed a general waiver of any and all claims, known and unknown,
10 including a waiver of California Civil Code § 1542, which I understand was not required of other
11 Class Members.

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

14 Executed on this 9th day of August 2023, at Carson City, Nevada.

15 DocuSigned by:
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17 Victoria Tice
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