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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 PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: April 12, 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. I understand that this action was brought on behalf of all other employees in the State of California, and that I am acting as a representative for the Settlement 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.

6. I have and continue to be willing to assist in the investigation of this matter, including meeting, conferring, discussing the case with my attorneys, providing any necessary information and documents, making myself available for trial or any further proceedings in this matter as required to represent the interests of the Class. I also understand my duties and responsibilities to the proposed Class and will carry out those duties as necessary.

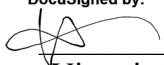
7. I have discussed the case with my attorneys on a number of occasions, provided information and documents to my attorneys to help with the prosecution of the case, sat for deposition, and reviewed documents in the case, including the Joint Stipulation of Class Action Settlement ("Stipulation" or "Settlement Agreement").

8. I have discussed the terms of the Settlement Agreement with my attorneys, and

1 based on the information provided, I believe the settlement to be fair, adequate, and reasonable
2 for myself and for the entire Class.

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

5 Executed on this 9th day of March 2023, at Carson City, Nevada.

6 DocuSigned by:
7 
8 Victoria Tice
9 5C57510401E1