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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – POMONA COURTHOUSE

LAUREN BRADY, individually, and on
behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiff,

vs.

SEIDNER ENTERPRISES, LLC DBA
BERT'S MEGA MALL, a California limited
liability company; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 20PSCV00276

Honorable Gloria White-Brown
Department J

**DECLARATION OF LAUREN BRADY
IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF
PRIVATE ATTORNEYS GENERAL
ACT (CAL. LAB. CODE § 2698, ET SEQ.)
SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEY'S FEES AND
COSTS, SERVICE AWARD, AND
SETTLEMENT ADMINISTRATION
COSTS**

[Notice of Motion and Motion for Approval
of Private Attorneys General Act (Cal. Lab.
Code § 2698, Et Seq.) Settlement Agreement
and Award of Attorney's Fees and Costs,
Service Award, and Settlement Administration
Costs; Declaration of Edwin Aiwazian; and
[Proposed] Order and Judgment filed
concurrently herewith]

Reservation ID: 967312543962305742508266
Date: April 5, 2021
Time: 10:00 a.m.
Department: J

Complaint Filed: April 13, 2020
Trial Date: None Set

DECLARATION OF LAUREN BRADY

I, **Lauren Brady**, 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, and 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 Seidner Enterprises, LLC DBA Bert's Mega Mall ("Seidner") from approximately August 2017 to approximately March 2019 as a non-exempt, hourly-paid employee. I decided to seek legal advice about my work experiences at Seidner and about filing a lawsuit to seek to redress my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure Seidner was held accountable for not properly compensating aggrieved employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately 7 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost 6 hours discussing my situation, representative action lawsuits under the Private Attorneys General Act ("PAGA"), and what it meant to bring a PAGA action.

3. Since becoming involved in this matter, I have spent over 15 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which has included providing documents concerning my employment with Seidner, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of other non-exempt employees who worked for Seidner, and helping develop a strategy as to what documents and information to obtain from Seidner. 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. Throughout my involvement in this case, 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 as I could. I spent at least 12 hours speaking with my attorneys about the case, sending them documents,

1 identifying potential witnesses, and also describing policies, practices, and procedures of
2 Seidner.

3 5. I spent about 3 hours reviewing the settlement agreement and about 3 hours
4 asking questions and discussing the potential settlement with my attorneys before signing the
5 settlement agreement.

6 6. I believe that I have done everything that my attorneys have asked of me and
7 tried, to the best of my ability, to seek relief for the aggrieved employees and the State of
8 California. I think my efforts helped to get the result obtained in this case.

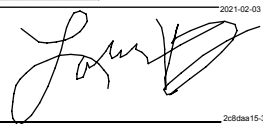
9 7. I respectfully request that the Court approve and award me a service award in the
10 amount of \$7,500.00 for my efforts and active participation in the case and broader release of
11 claims. Taking into consideration the time that I dedicated to this case, I believe that this amount
12 is reasonable.

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

14 9. I have not entered into any undisclosed agreements, nor have I received any
15 undisclosed compensation in this case. The only compensation I will receive is a service award,
16 if approved by the Court, as well as my share of the settlement as an aggrieved employee.

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

19 Executed on February 03, 2021, at Glendora, California.

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21 Electronically Signed 2021-02-03 20:02:05 UTC - 172.115.8.133
AssureSign® 20f8daa15-3c5c-4493-8cd9-acc40148dfc1

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