

LIM LAW GROUP, P.C.
Preston H. Lim (SBN 275249)
phl@limlawgroup.com
1504 W. Artesia Sq., Suite B
Gardena, CA 90248
Telephone: (213) 900-3000
Facsimile: (213) 204-3000

LAW OFFICES OF LLOYD LEE
Lloyd J. Lee (SBN 276453)
lloyd@pro-esq.com
25050 Ave Kearny, Suite 107-A
Valencia, CA 91355
Telephone: (661) 480-2420
Facsimile: (213) 995-6344

Attorneys for Plaintiff SHARI RILEY,
individually, and on behalf of other
members of the general public
similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES- CENTRAL

SHARI RILEY, individually, and on behalf of
other members of the general public similarly
situated;

Plaintiff,

v.

PRIMITIVE COMPANY, a California
corporation; and Jubal Jones, an individual;
Mitch Bhatia, an individual, Paul Rodriguez,
Jr., an individual; and DOES 1 through 50,
inclusive;

Defendants.

CASE NO. 20STCV07175

**DECLARATION OF SHARI RILEY IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: March 28, 2022
Time: 9:00 a.m.
Dept.: 17

Assigned to the Hon. Maren E. Nelson Dept 17

Complaint filed: 2/25/20
Trial date: None

DECLARATION OF SHARI RILEY

I, Shari Riley, declare as follows:

1. I am an individual I am an individual over the age of 18 and am the named plaintiff in this matter against Defendant Primitive Company, Jubal Jones, Mitch Bhatia, and Paul Rodriguez, Jr. ("Defendants"). This declaration is submitted in support of approval of the Settlement reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Primitive Company, which is owned and operated by Defendants. I was employed as a non-exempt employee as a production assistant and was subject to Defendant's wage and hour policies and practices that are at issue in this action. I was typically scheduled from 8:00 a.m. to 5:30 p.m. approximately 5 times a week.

3. During my employment, I believed that due to the amount of workload at the facility, it was difficult to take my meal breaks on time. There were also times when I worked off-the-clock on some occasions when I had to clock out for lunch and continue working to meet deadlines. Based on these events, I believe I was not paid all my wages owed to me, which resulted in receiving inaccurate wage statements as well.

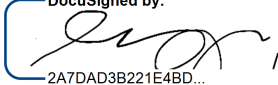
4. When I filed this lawsuit, I understood that this lawsuit could benefit my former co-workers, other employees with Defendant, and the State of California by helping to recover penalties on their behalf as a result of the alleged violations described above. I also understood that I was filing this case as a "class representative" and an "aggrieved employee" on behalf of myself and my fellow "aggrieved employees" as well as the State of California. When I filed this lawsuit, I knew there was a risk I could be liable for Defendant's costs if we lost the case. I also understood that filing a lawsuit is a public record. However, I accepted those risks so that I could help recover wages, damages, and penalties on behalf of other Defendant employees and the State of California.

5. I have been actively involved in this case since its inception. I have had many phone conversations (in addition to in-person meetings) with my attorneys throughout this case to discuss Defendants' wage and hour policies and practices, identify potential witnesses, and discuss

1 case strategy. I also gathered and reviewed documents for use in the lawsuit and reviewed
2 relevant documents with my attorneys. I estimate that I have spent approximately 30 hours in the
3 span of over a year performing these activities to help the case.

4 6. I understand that my attorneys will request that the Court award me an enhancement
5 award of \$5,000 for my services and efforts on the case. This proposed \$5,000 enhancement
6 award is not contingent upon me supporting the proposed Settlement.

7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct, and that I executed this declaration on 10/26/2021, at Los
9 Angeles County, California.

10 DocuSigned by:
11 
12 2A7DAD3B221E4BD...

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
Shari Riley