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Attorneys for Plaintiffs

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

ALICIA ORTEGA, BRYAN SHEPPARD,
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;
SHANTEANNA BROWN, RAYVEYONE
BROWN, individually, and on behalf of other
members of the general public similarly
situated

Plaintiffs,

vs.

SMARTGUARD, a California corporation; and
DOES 1 through 100, inclusive,

Defendants.

Case No. 34-2020-00278712-CU-OE-GDS

Honorable Laurie A. Damrell
Department 28

CLASS ACTION

**DECLARATION OF SHANTEANNA
BROWN IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Annabel Blanchard); Declarations
of Proposed Class Representatives (Alicia
Ortega, Bryan Sheppard, and Rayveyone
Brown); and [Proposed] Order filed
concurrently herewith]

Date: February 3, 2023
Time: 9:00 a.m.
Department: 28

Complaint Filed: May 15, 2020
FAC Filed: October 19, 2021
Trial Date: None Set

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1 potential witnesses, providing my attorneys with documents and information concerning the
2 case, and also describing policies, practices, and procedures of Smartguard.

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

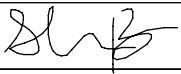
7 6. I believe that I have done everything that my attorneys have asked of me and have
8 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
9 obtained in this case, and as a class representative, I respectfully request that the Court award me
10 an enhancement payment in the amount of \$10,000.00 for my active participation in this case.
11 Taking into consideration the time that I have dedicated to this case, I believe that this amount is
12 reasonable.

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

14 8. 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 whatever amount
16 the Court awards as an enhancement payment, as well as my share of the settlement as a class
17 member.

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

20 Executed this ^{08/02/2022} ____ day of August 2022, at Sacramento, California.

21 Electronically Signed

2022-08-02 17:20:36 UTC - 166.216.158.159
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22 Shanteanna Brown