

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Annabel Blanchard (SBN 258135)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

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 RAYVEYONE
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 Shanteanna
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

DECLARATION OF RAYVEYONE BROWN

I, **Rayveyone Brown**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case. 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 Smartguard as an hourly-paid Security Guard from approximately March 2018 to approximately July 2018. I decided to seek legal advice about my work experiences with Smartguard. I contacted Lawyers *for* Justice, PC and spoke with attorneys there, including Arby Aiwarzian. I wanted to do whatever I could to make sure Smartguard was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **8 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **11 hours** discussing my situation, complex wage-and-hour class actions in general, and what it meant to join the lawsuit and be a named plaintiff and, class representative.

3. I have spent over **21 hours** meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with Smartguard reviewing documents with my attorneys and providing guidance regarding the duties of hourly-paid employees and helping develop a strategy as to what documents and information to obtain from Smartguard. 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. 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 and identified as many documents as I could. I spent at least **14 additional hours** speaking with my attorneys about the case, identifying

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 **6 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.

08/22/2022

20 Executed this ____ day of August 2022, at Sacramento, California.

21 Electronically Signed 2022-08-02 17:19:39 UTC - 107.127.18.15
Rayveyone Brown
Nintex AssureSign® 3d5ef06c-158c-462b-83d4-aeef011517c3

22 Rayveyone Brown
23
24
25
26
27
28