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

MIREYA TORRES, IDREES HOLLIS,
CHRISTOPHER GARCIA, CHUMANI
BROWN, 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,

Plaintiffs,

vs.

WILLIAMS LEA, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendant.

Case No.: 20STCV04508

Honorable Kenneth R. Freeman
Department SSC14

CLASS ACTION

**DECLARATION OF CHUMANI BROWN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, CLASS COUN
SEL'S FEES AND COSTS, AND
ENHANCEMENT PAYMENTS**

[Notice of Motion and Motion for Final Approval
of Class Action Settlement, Class Counsel's Fees
and Costs, and Enhancement Payments;
Declarations of Class Representatives (Mireya
Torres, Idrees Hollis and Christopher Garcia);
Declaration of Settlement Administrator (Jennifer
Beliveau); and [Proposed] Final Approval Order
filed concurrently herewith]

Date: January 18, 2024
Time: 10:00 a.m.
Department: SSC14

Complaint Filed: February 4, 2020
FAC Filed: July 29, 2022
Trial Date: None Set

DECLARATION OF CHUMANI BROWN

I, **Chumani 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. This declaration and its contents are not intended to waive any mediation, settlement, or any attorney client communication privileges or confidentiality.

2. I was employed by Defendant Williams Lea, Inc. ("Williams Lea") as an hourly-paid employee from approximately August 2017 to approximately October 2017. I decided to seek legal advice about my work experiences with Williams Lea and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Williams Lea paid me and other employees what was owed to us for all hours worked (e.g., for off-the-clock work, minimum and regular pay, and overtime pay), non-compliant meal and rest breaks, and failure to reimburse expenses. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 15 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 10 hours to discuss my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to join the lawsuit and be a named plaintiff, class representative, and a PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a class representative and PAGA representative, and also, if class certification were to be obtained, what my duties and responsibilities would be in that event.

3. I understand that the class claims alleged in this action were brought on behalf of other employees, and thus I am acting as a representative for the Class. As a class representative, I recognize that it is my responsibility to act in the Class's best interest and not my own. I will not put my own interests ahead of that of the Class. I am also not aware of any conflicts that exist between my interest and the interests of the Class that would impair or affect my ability to

1 serve as representative for the Class.

2 4. I have spent over 18 hours meeting with my attorneys regarding the case and
3 fulfilling my responsibilities as a class and PAGA representative, which included gathering
4 documents concerning my employment with Williams Lea, reviewing documents with my
5 attorneys and answering their questions, and providing guidance regarding the duties of non-
6 exempt employees, and helping develop a strategy as to what documents and information to
7 obtain from Williams Lea. I routinely checked in with my attorneys and their staff to make sure
8 that they had my most current information and any additional information that I had obtained.

9 5. Throughout the case, I was available to answer any questions my attorneys had,
10 and available to speak and meet with them whenever they needed me. I responded to my
11 attorneys as quickly as possible and gave them as much information and identified as many
12 documents as I could. I spent at least 9 additional hours speaking with my attorneys about the
13 case, identifying potential witnesses, providing my attorneys with documents and information
14 concerning the case, and also describing policies, practices, and procedures of Williams Lea.

15 6. As far as the settlement is concerned, I was available to review documents and
16 answer any questions my attorneys had. I spent about 3 hours reviewing the settlement
17 documents and about 3 hours asking questions and discussing the potential settlement,
18 mediation and outcome thereof, settlement paperwork, and amended settlement paperwork with
19 my attorneys before signing the settlement papers.

20 7. I understand that a settlement has been reached in my case to resolve the class
21 claims, and I further understand what my duties and responsibilities are as a class and PAGA
22 representative. For example, I am aware that if the settlement is granted preliminary approval,
23 the Court will certify a class for settlement purposes, and likely appoint me as the representative
24 of the class and my attorneys as counsel for the class. I also understand that I will be tasked
25 with checking in on, monitoring, and conferring with my attorneys and counsel for the class to
26 facilitate the notice and settlement administration process, and to provide information that the
27 Court needs to assess whether the settlement is fair, reasonable, and adequate. Further, if any
28 individuals who are potential class members contact me, I will take steps to have them referred

1 to the Court-appointed settlement administrator so that these individuals may receive whatever
2 information and notice they may be eligible to receive in connection with the settlement and
3 contemplated final approval hearing.

4 8. I believe that I have done everything that my attorneys have asked of me and have
5 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
6 and the State of California. I think my efforts helped to get the result obtained in this case, and
7 as a class and PAGA representative, I respectfully request that the Court award me an
8 enhancement payment in the amount of \$12,500.00 for my active participation in this case.
9 Taking into consideration the time that I have dedicated to this case, I believe that this amount
10 is reasonable.

11 9. I am not related to anyone associated with Lawyers *for* Justice, PC.

12 10. I have not entered into any undisclosed agreements, nor have I received any
13 undisclosed compensation in this case. The only compensation I will receive is whatever amount
14 the Court awards as an enhancement payment, as well as my share of the settlement as a class
15 member and as an aggrieved employee.

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

18 Executed on 06/15/2023, at Vallejo, California.

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An electronic signature box containing a handwritten signature. The signature appears to be 'CB' or similar initials. The box includes the text 'Electronically Signed' at the top left, '2023-06-15 18:29:55 UTC - 104.28.124.39' at the top right, 'Ximbox AssureSign®' at the bottom left, and '83de56f3-b950-4095-87af-b022012c7f6e' at the bottom right.

Chumani Brown