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Attorneys for Plaintiff and the Class

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

CHIDIMMA IGBOAKAEZE, 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,

Plaintiff,

v.

VERA BRADLEY SALES, LLC, an
unknown business entity; VERA BRADLEY
DESIGNS, INC., an unknown business entity;
and DOES 1 through 100, inclusive,

Defendants.

Case No.: 20STCV04294

Honorable Yvette M. Palazuelos
Department SSC-9

CLASS ACTION

**DECLARATION OF CHIDIMMA
IGBOAKAEZE IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement;
Declaration of Class Counsel (Edwin
Aiwasian); Declaration of Settlement
Administrator (Taylor Mitzner); and
[Proposed] Order filed concurrently
herewith]

Date: July 18, 2023
Time: 10:00 a.m.
Department: SSC-9

Complaint Filed: February 3, 2020
FAC Filed: July 15, 2020
Trial Date: None Set

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1 4. As the case progressed, I was available to answer any questions my attorneys had,
2 and available to speak and meet with my attorneys whenever they needed me. I responded to
3 them as quickly as possible and gave them as much information and identified as many
4 documents as I could. I spent at least 14 additional hours speaking with my attorneys about the
5 case, identifying potential witnesses, providing my attorneys with documents and information
6 concerning the case, and also describing policies, practices, and procedures of Defendants.

7 5. As far as the settlement is concerned, I was available to review documents and
8 answer any questions my attorneys had. I spent about 2 hours reviewing the settlement
9 agreement and an additional 1.5 hours asking questions and discussing the potential settlement
10 with my attorneys before signing the settlement agreement.

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

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

19 8. I have no interest or involvement in the governance or work of the proposed cy
20 pres recipient, Los Angeles Legal Aid Foundation.

21 9. I have not entered into any undisclosed agreements, nor have I received any
22 undisclosed compensation in this case. The only compensation I will receive is whatever amount
23 the Court awards as an enhancement payment, as well as my individual settlement payment and
24 individual PAGA payment.

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

27 Executed this 20 day of July 2022, at Lawndale, California.

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