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Attorneys for Plaintiff

**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 SSC9

CLASS ACTION

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

[Plaintiff's Motion for Preliminary Approval
of Class Action Settlement; Declaration of
Proposed Class Counsel (Edwin Aiwazian);
and [Proposed] Order filed concurrently
herewith]

Date: **TBD**
Time: **TBD**
Department: SSC9

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

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4. As the case progressed, 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 potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendants.

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

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

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

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

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

03/18/2022
Executed this ____ day of March 2022, at Lawndale, California.

Electronically Signed _____ 2022-03-18 20:54:09 UTC - 172.58.17.18

Chidimma Igboakaeze

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Chidimma Igboakaeze