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Attorneys for Plaintiff and others similarly situated

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CINNAMON MILLS, individually, on
a representative basis, and on behalf of
all others similarly situated;

Plaintiff,

vs.

TARGET CORPORATION, a
Minnesota Corporation; and DOES 1
through 20, inclusive;

Defendants.

Case No.: 5:20-CV-01460-JGB-KK
[Assigned to Hon. Jesus G. Bernal]

FRCP RULE 23 CLASS ACTION

**DECLARATION OF PLAINTIFF
CINNAMON MILLS IN SUPPORT
OF MOTION FOR FINAL
APPROVAL**

1 I, Cinnamon Mills, state and declare:

2 1. I am the Plaintiff in the above captioned action and have personal
3 knowledge of all matters stated herein and could competently testify thereto. I make this
4 declaration in support of the motion for final approval of the class action settlement. I
5 believe that the settlement is fair and reasonable and constitutes a fair resolution of the
6 claims alleged.

7 2. At the conclusion of my employment with Target, there were several issues
8 that concerned me and which I thought did not comply with California law. And even
9 though I was unsure of whether I wanted to bring a lawsuit because of the risk of
10 stepping forward as a whistle blower (since this could make it difficult to find future
11 jobs), I retained Lauby, Mankin & Lauby LLP to proceed with this class action because I
12 did not think that I or the other employees were being treated correctly.

13 3. When I first retained my attorneys and chose to pursue this case on a class
14 action basis, I understood that I had specific burdens as the "Class Representative,"
15 which included: (a) representing the interests of all class members, (2) considering the
16 interests of all class members above my own personal interests, (3) participating actively
17 in the lawsuit, including potential testimony at deposition and trial, and keeping generally
18 aware of the status and progress of the lawsuit. Moreover, I understood that any
19 resolution of the lawsuit is subject to court approval and must be designed in the best
20 interests of the class as a whole.

21 4. I respectfully request that the court approve the service award for the
22 following reasons.

23 5. First, I have spent substantial time working on this case and have performed
24 substantial services for the Class to help obtain a highly beneficial settlement for my
25 fellow employees. Since first initiating this action, I estimate that I have spent at least
26 one hundred (100) hours engaged in activities to benefit the class. I have assisted my
27 attorneys in numerous ways, including helping to explain and discuss the company's
28 practices, locating and analyzing company documents, and communicating with other

1 class members. These efforts occurred through numerous meetings with Class Counsel,
2 telephone conferences, letters, emails, and text communications. I also spent substantial
3 time in preparation for my deposition and appeared for deposition on two separate days.
4 I then spent time assisting my attorneys with the class certification process and with tasks
5 connected to Target's attempt to defeat the case in their motion for summary judgment.
6 Then, during the appeal process, I continually communicated with my attorneys to keep
7 updated and prepare for the next steps. Finally, after the appeal was over, I participated in
8 the settlement process, reviewed all settlement documents, and assisted with the various
9 motions for approval.

10 6. Second, I believe the requested service award is warranted because I helped
11 achieve exactly what we intended – repayment in full to every class member for the
12 underpaid vacation wages. From my understanding, each class member received the full
13 amount owed, and many received more because of the guaranteed minimum payment.

14 7. Third, I respectfully request that the Court approve the agreed-upon service
15 award because I agreed to set aside my personal interests and to put the interests of the
16 class ahead or on par with my own. In doing so, and by successfully bringing this case as
17 a class action, I helped to obtain a highly beneficial settlement for the class members.

18 8. Fourth, as a condition of this class action settlement, I was required to
19 release and waive all possible individual claims against the company – something that
20 none of the other class members were required to give up. And this was a difficult
21 decision because I was considering whether to bring wrongful termination and related
22 claims against Target for issues that arose during employment. But, in the end, I decided
23 to give up my right to bring such claims in order to benefit the class as a whole.

24 9. Fifth, by bringing this case as a class action, I undertook significant risks and
25 stresses at a high emotional cost without any guarantee of success. For example, filing
26 this lawsuit and being a whistle blower was stressful on a day-to-day basis as I have
27 constantly worried about the risk that this case could impact my ability to find future
28 jobs. This stress/risk lasted for the entire case, especially in the lead up to my deposition,

1 and I'm worried it may make it hard to find a job in the future.

2 10. Sixth, bringing this case also came with a major financial risk because, if I
3 lost the case, I would be required to pay the company's costs, which could be well over
4 \$10,000, and there was a chance they could try to make me pay attorneys' fees as well.

5 11. Therefore, I respectfully request that the Court award the full requested
6 service award since that amount is justified based on the facts above.

7 I declare under penalty of perjury under the laws of the State of California and the
8 United States of America that the foregoing is true and correct. Executed on Mar 4, 2024
9 at Riverside, California.

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11 By: 
12 Cinnamon Mills (Mar 4, 2024 21:55 PST)
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