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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 PRELIMINARY
APPROVAL**

Complaint filed: June 10, 2020

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 preliminary approval of the class action
5 settlement. I believe that the settlement is fair and reasonable and constitutes a fair
6 resolution of the claims alleged.

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

15 3. Since first initiating this action on behalf of the proposed class, I believe that
16 I have more than adequately performed my duties as a class representative. I have been
17 an active participant in this litigation, including assisting my attorneys in various ways
18 and making myself available when needed. For example, I have assisted my attorneys by
19 compiling and analyzing substantial documentation regarding the claims in this case. I
20 have also helped to explain and discuss the company’s practices and their general
21 practices and procedures, locating and analyzing company documents, among others. I
22 have also had my deposition taken and assisted my attorneys during the appeal in the
23 Ninth Circuit Court of Appeal. I believe that this settlement is fair for the class, and I will
24 continue to take all steps necessary to finalize this settlement and obtain court approval.

25 4. I have no conflicts with the proposed class members and will continue to
26 assist with the litigation and prosecute the case on behalf of the other employees.

27 5. I respectfully request that the court preliminarily approve the service award.
28 As outlined above, I have performed substantial services for the Class and helped obtain

1 a highly beneficial settlement for my fellow employees. And I have also agreed to waive
2 all of my claims against the company as part of this settlement and in exchange for the
3 service award – which goes well beyond the release given by other class members. At the
4 final approval stage, I will submit an additional declaration setting forth all the work I did
5 for this case, including an estimated number of hours spent assisting the Class and my
6 attorneys.

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 Oct 11, 2023,
9 at Riverside, California.

10 By: Cinnamon mills
Cinnamon Mills (Oct 11, 2023 12:58 PDT)
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Mills v. Target

Final Audit Report

2023-10-11

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