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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

ABRAHAM MARIN, individually, and on
behalf of other members of the general public
similarly situated; SHEREE WILLIS,
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.

WORD & BROWN COMPANIES, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 30-2019-01055348-CU-OE-CXC

Honorable Peter J. Wilson
Department CX102

CLASS ACTION

**DECLARATION OF SHEREE WILLIS IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

[Plaintiffs' Motion for Preliminary Approval
of Class Action Settlement; Declaration of
Class Counsel (Edwin Aiwazian); Declaration
of Class Representative (Abraham Marin);
and [Proposed] Order filed concurrently here-
with]

Date: September 15, 2022
Time: 2:00 p.m.
Department: CX102

Complaint Filed: March 6, 2019
FAC Filed: January 13, 2021
Trial Date: None Set

DECLARATION OF SHEREE WILLIS

I, **Sheree Willis**, 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.

2. I was employed by Defendant Word & Brown Insurance Administrators, Inc. (“Word & Brown”) in an hourly-paid, non-exempt position from approximately January 2001 to March 2019. I decided to seek legal advice about my work experiences with Word & Brown 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 Word & Brown paid me and other employees what was owed to us for all hours worked and non-compliant meal and rest breaks. 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 5 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 8 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 be a named plaintiff, class representative, and PAGA representative.

3. I spent over 8 hours communicating with my attorneys and fulfilling my responsibilities as a class representative in this case, which included gathering documents concerning my employment with Word & Brown, reviewing documents with my attorneys, answering their questions, providing guidance regarding the work performed by non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Word & Brown. I frequently checked in with my attorneys and their staff to make sure that they had my most current information and any additional information that I had obtained.

4. I was available to answer any questions my attorneys had, and available to speak and meet with them whenever they needed me. I responded to my attorneys as quickly as possible and gave them as much information and identified as many documents as I could. I

1 spent at least 5 additional hours speaking with my attorneys about the case, identifying potential
2 witnesses, providing my attorneys with documents and information concerning the case, and
3 also describing policies, practices, and procedures of Word & Brown.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I spent about 2 hours reviewing the settlement
6 documents and about 2 hour asking questions and discussing the potential settlement with my
7 attorneys before signing the settlement papers.

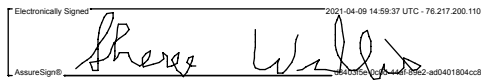
8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
10 obtained in this case, and as a class and PAGA representative, I respectfully request that the
11 Court award me a service payment in the amount of \$5,000.00 for my active participation in this
12 case. Taking into consideration the time that I have dedicated to this case, I believe that this
13 amount is reasonable.

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

15 8. I have not entered into any undisclosed agreements, nor have I received any
16 undisclosed compensation in this case. The only compensation I will receive is whatever
17 amount the Court awards as a service payment, as well as my share of the settlement fund as a
18 class member.

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

21 Executed on 04/09/2021, at El Cahan, California.

22
23 The image shows an electronic signature of Sheree Willis. The signature is written in cursive and is contained within a rectangular box. Above the signature, the text "Electronically Signed" is visible. To the right of the signature, the date and time "2021-04-09 14:59:37 UTC - 78.217.200.110" are displayed. Below the signature, the text "AssureSign" is visible.

24 Sheree Willis