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Attorneys for Plaintiffs and the Settlement Class Members

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO

NEQUASHA POTTS individually, and on behalf of other members of the general public similarly situated; MARQUIS BERRY, individually, and on behalf of other members of the general public similarly situated; TATIANA BENJAMIN individually, and on behalf of members of the general public similarly situated and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act.

Plaintiffs,

vs.

DOLLS KILL, INC., an unknown business entity; TRINET GROUP, INC., an unknown business entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: CGC19580228

Honorable Ethan P. Schulman
Department 302

CLASS ACTION

**DECLARATION OF NEQUASHA POTTS
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES, COSTS, AND ENHANCEMENT
PAYMENTS**

[Notice of Motion and Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Payments; Declaration of Class Counsel (Edwin Aiwazian); Declarations of Class Representatives (Marquis Berry, and Tatiana Benjamin); Declaration of Settlement Administrator (Taylor Mitzner); and [Proposed] Final Approval Order and Judgment filed concurrently herein]

Date: July 1, 2021
Time: 9:30 a.m.
Department: 302

Complaint Filed: October 23, 2019
FAC Filed: February 22, 2021
Trial Date: None Set

DECLARATION OF NEQUASHA POTTS

I, **Nequasha Potts**, 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 Defendants Dolls Kill, Inc. and Trinet Group, Inc. (together, “Dolls Kill”) in an hourly-paid, non-exempt position from approximately May 2016 to March 2018. I decided to seek legal advice about my work experiences with Dolls Kill 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 Dolls Kill 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 7 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 4 hours to discuss my situation and complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and class representative.

3. I have spent over 12 hours speaking and communicating with my attorneys and fulfilling my responsibilities as a class representative in this case. This included gathering documents concerning my employment with Dolls Kill, reviewing documents with my attorneys, answering their questions, providing information and guidance regarding the work performed by other non-exempt employees at Dolls Kill, and helping develop a strategy as to what documents and information to obtain. 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. Throughout the case, 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 spent at least 11 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 Dolls Kill.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about 3 hours reviewing the settlement documents, including the class notice, and about 3 hours asking questions and discussing the potential settlement with my attorneys before signing the settlement papers.

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. I think my efforts helped to get the result obtained in this case, and as a class 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 case, 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 share of the settlement fund as a class member.

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

Executed on 12/10/2020, at Oakland, California.

Electronically Signed
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Nequasha Potts