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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 TATIANA
BENJAMIN 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 (Nequasha Potts and Marquis
Berry); 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 TATIANA BENJAMIN

I, **Tatiana Benjamin**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am a proposed named plaintiff 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 November 2015 to July 2017. 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 8 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 5 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 a PAGA representative.

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

1 identified as many documents as I could. I spent at least 9 additional hours speaking with my
2 attorneys about the case, identifying potential witnesses, providing my attorneys with documents
3 and information concerning the case, and also describing policies, practices, and procedures of
4 Dolls Kill.

5 5. As far as the settlement is concerned, I was available to review documents and
6 answer any questions my attorneys had. I spent about 4 hours reviewing the settlement
7 documents and about 3 hours asking questions and discussing the potential settlement with my
8 attorneys before signing the settlement papers.

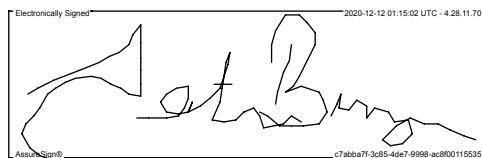
9 6. I believe that I have done everything that my attorneys have asked of me and have
10 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
11 obtained in this case, and as a proposed class and PAGA representative, I respectfully request
12 that the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

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

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

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

22 Executed on December 11, 2020, at Pinole, California.

23 The image shows an electronic signature of Tatiana Benjamin. The signature is written in a cursive, handwritten style. Above the signature, the text "Electronically Signed" is visible. To the right of the signature, the date and time "2020-12-12 01:15:02 UTC - 4:28:11:70" are displayed. Below the signature, there is a long alphanumeric string: "c7abb0a71-3c85-40e7-9999-ac800115535".

24
25 Tatiana Benjamin