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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MERCED

JASON ADAMS, RAUL ALVARADO, EMMA SARWAR, SERGIO RODRIGUEZ, and SHENITA TATUM, as private attorneys general and as an individual and on behalf of all others similarly situated,

Plaintiffs,

vs.

SCHOLLE IPN PACKAGING, INC., a Nevada corporation; SCHOLLE PACKAGING, INC., a Nevada corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 20CV-02350

DECLARATION OF SHENITA TATUM IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Date: January 9, 2025
Time: 8:15 a.m.
Department: 8

Complaint Filed: August 17, 2020
FAC Filed: August 30, 2024

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16 Attorneys for Plaintiffs Alvarado, Sarwar, and Rodriguez
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1 I, Shenita Tatum, declare as follows:

2 1. I am an individual over the age of 18. I am a named plaintiff in the above-reference
3 action. I have personal knowledge of the facts set forth below, except as to those matters stated on
4 information and belief and, as to those matters, I believe them to be true. If called as a witness, I could
5 testify competently as to the matters stated in this declaration.

6 2. In April of 2022, I began working for Scholle IPN Packaging, Inc. as a machine operator
7 and worked in California for the company for 30 or more days within a year. Until my employment
8 ended in June of 2023, I was paid on an hourly basis as a non-exempt employee and earned non-base
9 hourly wages or other non-hourly, non-discretionary remuneration, including for example shift
10 premiums. Throughout my employment, I accrued and actually used sick leave. I was informed and
11 believed that when sick leave was used in workweeks that I also earned non-base hourly wages or other
12 non-hourly, non-discretionary remuneration in addition to my base hourly wages, sick pay wages were
13 paid at my base rate of pay rather than my regular rate of pay. I was informed and believed that I both
14 was not timely paid all due wages during employment or upon separation of employment and also was
15 not provided with accurate itemized wage statements.

16 3. During the pendency of this lawsuit, I have done my best to represent the interests of the
17 employees that are part of the class. I have actively contributed to the litigation of this case. My
18 contributions include but are not limited to (i) participating in numerous telephonic meetings with my
19 attorneys and their staff to discuss the case and review documents prepared on my behalf, (ii) providing
20 my attorneys with information and documents regarding my employment with the company, (iii)
21 searching for additional information and documents requested by my attorneys, (iv) reviewing and
22 approving the written notice to the Labor and Workforce Development Agency, the complaint, other
23 papers filed with the court, (v) reviewing documents and information my attorneys were provided by the
24 company or its attorneys, (vi) being available for a mediation, (vii) reviewing and executing the
25 settlement agreement, and (viii) reviewing and signing the declarations submitted to this Court in
26 support of the settlement.

27 4. I have taken all necessary steps to represent the interests of the Class, including by
28 providing information and documents to my counsel, discussing the claims and lawsuit with my counsel,

1 and answering any questions that have come up. I remain willing to devote my time to this lawsuit for
2 the benefit of the Class. I do not believe I have any interests that are adverse to the interests of the Class.
3 I also am unaware of any such issues having been raised or presented by anyone else.

4 5. I believe many employees would not sue their employer out of fear. I took on risks by
5 bringing this lawsuit, and I understand that other people will benefit because of the actions that I have
6 taken. I feel that it is a positive accomplishment, am proud of the result, and believe that the class
7 settlement is fair, adequate, and reasonable.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing is
9 true and correct. Executed this ⁶ day of December 2024, at Merced, California.

10 Signed by:

C9208D4143A14FB...

11 Shenita Tatum
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