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 and other individuals similarly situated

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SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO

DENISE DROESCH; KYONNA
 HARRISON; and JANISHA LEE PRICE
 as individuals and on behalf of other
 aggrieved employees,

Plaintiffs,

vs.

WELLS FARGO BANK, N.A., a United
 States Corporation, and DOES 1 – 10,
 inclusive

Defendants.

CASE NO. 34-2021-00292066-CU-OE-GDS

**DECLARATION OF JANISHA LEE
 PRICE IN SUPPORT OF PLAINTIFFS’
 UNOPPOSED MOTION FOR
 PRELIMINARY APPROVAL OF CLASS
 ACTION SETTLEMENT AND
 PROVISIONAL CLASS
 CERTIFICATION**

[Filed and served concurrently with Notice of
 Motion; Memorandum of Points &
 Authorities; Declarations of Attorneys
 Christina A. Humphrey; Marcus J. Bradley;
 of Plaintiffs Denise Droesch; Kyonna
 Harrison; of Settlement Administrator; and
 [Proposed] Order]

Date: November 1, 2024

Time: 9:00 a.m.

Reservation #: A-292066-001

Dept.: 23

Judge: Jill H. Talley

Complaint filed: January 7, 2021

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DECLARATION OF JANISHA LEE PRICE

I, Janisha Lee Price, declare:

1. I am over the age of 18 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 am one of the three named Plaintiffs in this litigation, serving as a Class Representative and PAGA Representative. I have no personal relationship or family ties to my attorneys or any officer of the Court. My attorneys are not working on my behalf in another capacity other than representing me in this lawsuit. This declaration is submitted in support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement and Provisional Class Certification.

3. I worked for Defendant WELLS FARGO BANK, N.A. ("Defendants" or "Wells Fargo"), from August 10, 2015 to December 1, 2022, as an hourly Telephone Banker at the Call Center operated by Wells Fargo in San Bernardino, California.

4. I have spent a substantial amount of time and energy contributing to the investigation, prosecution and settlement of this case. Since hiring my attorneys through the present date, I have exchanged countless emails and phone calls with both of my counsel and met them in person at least once. I answered discovery and exchanged and reviewed documents in preparation for deposition. I estimate that I have spent 35 hours litigating this case.

5. During this entire process, I have always had the best interests of the other employees and the State of California in mind and worked hard on their behalf. My claims in this case are typical of the claims of the other Settlement Class Members and Aggrieved Employees and I have no conflicts with any of the other Settlement Class Members or Aggrieved Employees.

6. I was also involved in settlement discussions as they occurred throughout this Case and was available during the mediation. I also had long discussions with counsel prior to the mediation regarding certain facts of the case, assisted in gathering declarations, reviewing

documents, and working with an expert so that he could do a full report on my damages based on my time records and interview.

7. As part of the proposed Settlement, I agreed to a full release of claims related to my employment with Wells Fargo, including a waiver of Civil Code section 1542, that extends beyond the release of claims applicable to the Settlement Class members and Aggrieved Employees.

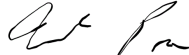
8. I understand that my attorneys will request that the Court award me a Representative Incentive Award of \$2,500 for my service and efforts on the case. This proposed \$2,500 Representative Incentive Award is not contingent upon me supporting the proposed Settlement.

9. I do not have any interest, relationship, or involvement with the proposed *cy pres* recipient, Legal Aid at Work.

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

Executed this 4th day of October, 2024, at San Bernardino, California.

DocuSigned by:



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Janisha Lee Price,
Declarant