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Attorneys for Plaintiffs Denise Droesch,
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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 KYONNA
 HARRISON 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; Janisha Lee
 Price; 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 KYONNA HARRISON

I, Kyonna Harrison, 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 have worked for Defendant WELLS FARGO BANK, N.A. ("Defendants" or "Wells Fargo"), from September 4, 2012 until present as an hourly, non-exempt Telephone Banker at the Call Center operated by Wells Fargo located 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. I have exchanged numerous emails and phone calls, assisted in locating witnesses, provided lengthy interviews, answered multiple sets of discovery, provided declarations and deposition testimony. I estimate that I have spent approximately 75 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 Aggrieved Employees. As far as I am aware, 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 interviewing other putative class

members on their experiences (which took up a substantial amount of my time), reviewing documents, and working with an expert so that he could do a full report on my damages.

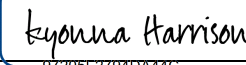
7. As part of the proposed Settlement, I agreed to a full release of claims related to my employment with Wells Fargo, including a waiver of Civil Code section 1542, that extends beyond the release of claims applicable to the Settlement Class members and Aggrieved Employees. Also, since I remain employed by Wells Fargo, I also received a separate individual settlement (apart from the class representative enhancement which is subject to Court approval) \$5000 in exchange to be bound by other terms that no other settlement class member or class representative agreed to be bound by.

8. I understand that my attorneys will request that the Court award me a Representative Incentive Award of \$5,000 for my service and efforts on the case. This proposed \$5,000 Representative Incentive Award is not contingent upon me supporting the proposed Settlement. I do not regret stepping forward to help other employees and improve working conditions. I have worked at Wells Fargo for twelve (12) years and believe I did the right thing.

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 Rancho Cucamonga, California.

DocuSigned by:

97205F2794DA44C...
 Kyonna Harrison,
 Declarant