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Attorneys for Plaintiff

SUPERIOR COURT FOR THE STATE OF CALIFORNIA

FOR THE COUNTY OF SACRAMENTO

KRYSTAL CAMINA, individually, and on behalf of other members of the general public similarly situated and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act;

Plaintiff,

vs.

WOK IN THE PARK LLC, a California limited liability company; CAFETERIA 15L, an unknown business entity; and DOES 1 through 100, inclusive,

Defendants

Case No. 34-2020-00283344-CU-OE-GDS

Honorable Lauri A. Damrell
Department 22

CLASS ACTION

DECLARATION OF KRYSTAL CAMINA IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

[Notion of Motion and Motion for Preliminary Approval of Class Action Settlement; Declaration of Proposed Class Counsel (Jeremy Stern); Declaration of Proposed Class Representative (Krystal Camina); and [Proposed] Order filed concurrently herewith]

Date: June 7, 2024
Time: 9:00 a.m.
Department: 22

Complaint Filed: August 12, 2020
Trial Date: None Set

DECLARATION OF KRYSTAL CAMINA

I, **Krystal Camina,** 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 Wok in the Park, LLC, and Cafeteria 15L (together, "Defendants") as an hourly-paid, non-exempt employee, from approximately April 2019 to approximately June 2019, in the State of California, County of Sacramento. I decided to seek legal advice about my experiences working for Defendants and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure Defendants were held accountable for not properly compensating employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately 3 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for approximately 8 hours discussing my situation and class actions in general, and what it meant to be a named plaintiff and a class representative.

3. I have spent over approximately 11 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which has included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, answering questions, and providing guidance regarding the duties of hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all my most current information and to provide them with 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 my attorneys whenever they needed me. I responded to

them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least 7 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 Swift Engineering, Inc.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about 2 hours reviewing the settlement agreement and about 1 hour asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to seek relief for the general public similarly situated and on behalf of other aggrieved employees. I think my efforts helped to get the result obtained in this case, and as a class representative, I respectfully request that the Court approve and award me an Enhancement Award in the amount of 10,000.00 for my efforts and active participation in the case, and broader release of claims. Taking into consideration the time that I 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 an Enhancement Award, if approved by the Court, as well as any portion of the settlement to which I may be entitled as an aggrieved employee and/or class member.

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

Electronically Signed 2024-02-29 22:25:11 UTC - 172.56.87.238
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02/29/2024

Executed this ____ day of February 2024, at _____, California.

Electronically Signed 2024-02-29 22:25:01 UTC - 172.56.87.238
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Krystal Camina