

Larry W. Lee (State Bar No. 228175)
 Max W. Gavron (State Bar No. 291697)
DIVERSITY LAW GROUP, P.C.
 515 S. Figueroa Street, Suite 1250
 Los Angeles, CA 90071
 (213) 488-6555
 (213) 488-6554 facsimile

William L. Marder (State Bar No. 170131)
Polaris Law Group
 501 San Benito Street, Suite 200
 Hollister, CA 95023
 (831) 531-4214
 (831) 634-0333 facsimile

David J. Lee, Esq., State Bar No. 296294
 david@davidjleelaw.com
DAVID LEE LAW, APC
 515 S. Flower Street, Suite 1900
 Los Angeles, California 90071
 T: (213) 236-3536
 F: (866) 658-4722

Attorneys for Plaintiffs, the Class, and Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SAN BERNARDINO**

JAMES PEVEY, as an individual and on
 behalf of all others similarly situated,

Plaintiffs,

vs.

LUMBER CITY CORP., a California
 corporation d/b/a DIY HOME CENTER;
 and DOES 1 through 50, inclusive,

Defendants.

Case No.: CIVDS2010240

[Assigned for all purposes to the Hon. David
 Cohn, Dept. S-26]

**DECLARATION OF ANNE PETERSON IN
 SUPPORT OF PLAINTIFFS' MOTION FOR
 FINAL APPROVAL OF CLASS ACTION
 SETTLEMENT**

Date: May 2, 2022
 Time: 10:00 a.m.
 Dept.: S-26

Complaint Filed: June 2, 2020
 FAC Filed: January 29, 2021
 SAC Filed: July 23, 2021
 Trial Date: Not Set

DECLARATION OF ANNE PETERSON

I, Anne Peterson, declare as follows:

1. I am an individual over the age of 18. I am the named plaintiff in the above-reference action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I was employed by Defendant Lumber City Corp. ("Lumber City") as a salesperson from about January 2017, until about July 1, 2020. I worked as an hourly, non-exempt employee at Lumber City's store in Lake Tahoe, California.

3. During my employment, the wage statements issued to me by Lumber City did not identify the applicable rates of pay for all hours worked, pay period start and end dates, and accurate gross and net wages earned. In addition, throughout my employment, I was not allowed to leave the work premises during rest breaks and was not provided complete, off-duty meal breaks due to Lumber City's practice of rounding time.

4. I understand that this action was brought on behalf of all other employees in the State of California, and that I am acting as a representative for the Class. As a Class Representative, I understand that it is my responsibility to act in the best interests of the Class. I am not aware of any conflicts that exist between my interests and the interests of the Class that would impair or affect my ability to serve as representative for the Class.

5. I have and continue to be willing to assist in the investigation of this matter, including meeting and discussing the case with my attorneys, providing any necessary information and documents, making myself available for trial or any further proceedings in this matter as required to represent the interests of the Class. I also understand my duties and responsibilities to the proposed Class and will carry out those duties as necessary.

6. I have discussed the terms of the settlement with my attorneys, and based on the information provided, I believe the settlement to be fair, adequate, and reasonable for myself and for the entire Class.

7. Prior to and subsequent to the filing of the lawsuit against Defendant, I regularly conferred with my attorneys to discuss the status of the case, offer my input, and assist my

1 attorneys in gathering evidence that supported the class claims. For example, I discussed
2 Defendant's policies and practices related to the distribution of wage statements to employees to
3 prepare documents necessary to the lawsuit. I also conferred with my attorneys regarding the
4 proposed settlement at length. I estimate that throughout this case I have spent approximately 12
5 to 15 hours working with my attorneys to provide documents and information that would support
6 the successful resolution of the case.

7 8. I also provided documents and other relevant information in order to assist my
8 attorneys in this matter.

9 9. I am proud of the result and accomplishment of this lawsuit. I feel that it is a
10 positive accomplishment of this lawsuit. I understand that many individuals will benefit in this
11 lawsuit because of the actions that I have taken.

12 10. I feel that I took upon myself the risk of this lawsuit and achieved a result for my
13 other former co-workers who did not have to file suit.

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

16 Executed on this 4th day of April 2022, at South Lake Tahoe, California.

17 DocuSigned by:
18 *Anne Peterson*
19 Anne Peterson EC98EB961EE34D0...