

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 255-9047
Facsimile: (858) 404-9203
Website: www.zakaylaw.com

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 559-8292
Facsimile: (619) 559-8291
Website: www.jcl-lawfirm.com

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF EL DORADO**

JESSICA BARACKMAN, an individual, on
behalf of herself and on behalf of all persons
similarly situated,,

Plaintiff,

vs.

TEAZ N PLEAZ, INC., a California
Corporation dba SEDUCTIONS; and DOES 1
through 50, inclusive,

Defendant.

Case No: SC 20200179

**DECLARATION OF JESSICA
BARACKMAN IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS SETTLEMENT**

Date: February 25, 2022
Time: 1:30 p.m.
Dept.: 4

*[Assigned for All Purposes to Judge Michael J.
McLaughlin]*

Action Filed: December 21, 2020

1 I, Jessica Barackman, declare as follows:

2 1. I am over the age of eighteen, and the Plaintiff and Proposed Class Representative
3 in the above-entitled matter. I submit this declaration in support of Plaintiff's Motion for Final
4 Approval of Class Settlement and in support of my application for the requested Service Payment.
5 I have personal knowledge of all the facts stated herein. I could and would competently testify under
6 oath to these facts in court if requested to do so.

7 2. This class action lawsuit was filed on December 21, 2020. This case was filed on
8 behalf of myself and a class of current and former non-exempt employees who worked for
9 Defendant in California. ("Defendant"). I worked for Defendant between January 2018 and June
10 2020 as a non-exempt employee in California.

11 3. I decided to bring this lawsuit because I believed my rights and those of my
12 coworkers were violated by Defendant. Among other claims, I believe Defendant violated my rights
13 by not paying me for all the work I performed and not providing me with premiums when I did not
14 receive proper meal or rest breaks.

15 4. Before I was officially involved in the case as a Plaintiff and Class Representative I
16 spoke at length with my attorneys. We discussed my work experience and how Defendant's policies
17 and practices were applied to me and my coworkers. I provided my attorneys with numerous
18 documents they had requested to review and discussed at length my experience working for
19 Defendant and my responsibilities as a Plaintiff and proposed Class Representative. I also had a
20 chance to review, and did review, the complaint before it was filed.

21 5. After speaking with my attorneys, I knew that I was representing myself and other
22 employees in this case and that there were significant risks involved. One significant risk is that if
23 we lost the case, I could be held personally liable for paying all or part of the money Defendant paid
24 its attorneys to defend this case. There is also the risk that a future employer could hold it against
25 me that I sued a former employer. I decided to go through with the case because I believed violations
26 occurred and most employees would not know what their rights are, and even if they did they would
27 be apprehensive to file a lawsuit against their employer for fear of retaliation.
28

1 6. During the lawsuit, I communicated on a regular basis with my attorneys. I reviewed
2 status updates from my attorneys and court filings on a regular basis and spoke to my attorneys on
3 the phone regularly because I wanted to keep up with developments in the case which I understood
4 was one of my duties as a class representative.

5 7. I could not personally attend the mediation in this case due to work commitments,
6 but I was available and participated by having telephone conversations with my counsel. During the
7 mediation I actively participated by speaking to my attorneys. After the mediation concluded, I
8 continued to communicate with my attorneys regarding the terms of the Settlement which was
9 reached between the parties in this case. I was very satisfied with the terms of the Settlement that
10 was agreed to by the parties. I reviewed and signed the Memorandum of Understanding and when
11 the Settlement papers were ready, I again spoke with my attorneys and reviewed the Settlement
12 agreement, which I signed.

13 8. Since the beginning of my case approximately 18 months ago, I have been actively
14 involved with this class action lawsuit performing the duties described above. I was in regular
15 contact with my attorneys, spoke to several individuals about the case, reviewed important court
16 filings, and spent considerable time on the issues presented during the litigation and in the settlement
17 process. I estimate that I spent between 40-50 hours working on this case.

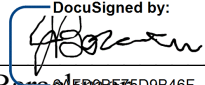
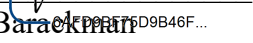
18 9. Ultimately, I believe I did the right thing in pursuing this case on behalf of the class
19 who now stand to receive substantial monetary payments as a result of this case and settlement. I
20 also believe that the requested Service Payment of \$10,000 from the settlement is fair compensation
21 for the work I performed, the broad release I agreed to, and the risks I undertook.

22 10. In light of all the time and effort I have spent on this case, the significant risks I
23 undertook by suing a former employer, the exposure to being responsible for paying Defendant's
24 costs in the event we did not win the case, the general release, and in light of the size of the
25 Settlement, I believe the request for \$10,000 as a Service Payment is fair and reasonable.

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27 //

1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct. Executed on 2/8/2022 at Job.

3
4
5 By:  DocuSigned by:
6 Jessica Barackman  6D9B46F...