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7 Attorneys for Plaintiff Nancy Taylor, on behalf of herself and all "aggrieved employees" pursuant
to Labor Code § 2698 et seq.

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF VENTURA**

11 NANCY TAYLOR, on behalf of herself and
12 all "aggrieved employees" pursuant to Labor
Code § 2698 et seq.,

13 Plaintiffs,

14 v.

15 MINER'S ACE HARDWARE, INC., a
16 California corporation, and DOES 1 through
10, inclusive,

17 Defendants.
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CASE NO: 56-2021-00558252-CU-OE-VTA

*Assigned to the Honorable Mark Borrell,
Department 40*

**DECLARATION OF NANCY TAYLOR IN
SUPPORT OF UNOPPOSED MOTION AND
MOTION FOR AN ORDER APPROVING
SETTLEMENT OF CLAIMS BROUGHT
PURSUANT TO THE PRIVATE
ATTORNEYS GENERAL ACT OF 2004,
AWARDING ATTORNEYS' FEES, COSTS,
GENERAL RELEASE PAYMENT, AND
REIMBURSEMENT OF SETTLEMENT
ADMINISTRATION EXPENSES, AND
DISMISSING ACTION WITH PREJUDICE**

Date: April 15, 2022

Time: 8:30 a.m.

Dept.: 40

Reservation #2627816

Complaint Filed: September 22, 2021

Trial Date: None

1 I, Nancy Taylor, hereby declare and state as follows:

2 1. I am a named Plaintiff in this lawsuit against Miner's Ace Hardware, Inc.
3 ("Defendant"), and I submit this declaration in support of Plaintiff's Unopposed Motion for An
4 Order Approving Settlement of Claims Brought Pursuant to the Private Attorneys General Act of
5 2004, Awarding Attorneys' Fees, Costs, General Release Payment, and Reimbursement of
6 Settlement Administration Expenses, and Dismissing Action with Prejudice. I am a competent
7 adult and was employed by Defendant as a non-exempt cashier from July 2013 through October
8 2020 in California. I have personal knowledge of the facts set forth herein, and if called as a
9 witness to testify to them, I could and would do so competently.

10 2. I contacted my current attorneys when I questioned the employment practices of
11 Defendant prior to commencing this lawsuit. I accepted the opportunity to act as a representative
12 on behalf of other employees of Defendant in this action whom I believed were being subjected to
13 labor law violations. Although presented with the opportunity, I did not pursue any case on an
14 individual basis and instead did so as a representative action so that I could help other employees
15 recover for what I believed were Defendant's improper practices.

16 3. Specifically, I questioned Defendant's policies of failing to pay overtime wages in
17 violation of Labor Code §§ 246, 510, and 1194; failing to provide legally compliant rest breaks to
18 Plaintiff and Aggrieved Employees in violation of Labor Code § 226.7; failing to provide legally
19 compliant meal breaks to Plaintiff and Aggrieved Employees in violation of Labor Code §§ 226.7
20 and 512; failing to provide suitable seats to Plaintiff and Aggrieved Employees in violation of
21 Labor Code §§ 226.7 and 512; failing to issue accurately itemized wage statements to Plaintiff and
22 Aggrieved Employees, in violation of Labor Code §§ 226(a) and 226.3; and failing to timely pay
23 wages to Aggrieved Employees in violation of Labor Code §§ 201-203. Through many
24 discussions with my lawyers, and through my own research on the Internet, I learned these may
25 be illegal practices and Defendant's non-exempt employees might have recourse for them.

26 4. By bringing this lawsuit, and throughout its course, I have put the interests of other
27 employees ahead of my own. I understood that I could possibly earn an incentive award if this
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1 case resolved itself favorably, but I also knew that I could also be responsible for paying
2 Defendant's attorneys' fees and costs if it did not.

3 5. My goal in bringing this lawsuit was to obtain a recovery on behalf of all employees
4 of Defendant, and even more importantly, to put an end to what I believed were illegal practices
5 on the part of Defendant after having worked for Defendant for close to two years. I believe I
6 have achieved both through this lawsuit and settlement.

7 6. I am very happy about the results of this litigation. I am satisfied that Defendant is
8 compensating other aggrieved employees and the State for penalties that I believe we are due.

9 7. Since the onset of this case and throughout the litigation, I have spent a lot of time
10 assisting my attorneys with this case, including numerous phone calls and emails to discuss what
11 I understood to be Defendant's policies and practices and how they were applied to other
12 employees. I kept actively involved with the status of this case throughout the litigation process,
13 tracking the status of the case and participating as much as possible.

14 8. While I have not maintained detailed time records of my activities in connection
15 with this litigation, I believe that have spent a total of approximately 15-20 hours assisting my
16 attorneys with the preparation of this case and doing work and investigation of the facts
17 independent from my attorneys both before and during this case.

18 9. Before this litigation commenced, and throughout its course, I spent approximately
19 2-3 hours gathering, organizing, and reviewing documents and information for this lawsuit. I
20 sifted through many of my own documents and reviewed information produced by Defendant as
21 part of this litigation.

22 10. I communicated with my attorneys several times per month to track my case's status,
23 and overall, I have maintained an active involvement in this matter throughout its course.

24 11. Taking the initiative with this case was very risky for me, both professionally and
25 financially. I put principal first and took a tremendous risk by filing this lawsuit. I am quite
26 confident that pursuing this lawsuit will result in future reputational harm to me. There is a stigma
27 associated with suing one's former employer. I suspect I may be adversely affected when it comes
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1 to obtaining future employment – employers who discover that I sued Defendant in a
2 representative action will likely avoid hiring me.

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

5 Executed on this 18th day of March, 2022 at Los Osos, California.

6 DocuSigned by:
7 *nancy taylor*
8 49109B1E7639423...
9 NANCY TAYLOR