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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

SHANNON BOSTIC, 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.

LAMP COMMUNITY, an unknown business
entity; LAMP, INC., a California Corporation;
THE PEOPLE CONCERN, a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 21STCV07381

Honorable Maren Nelson
Department SSC17

CLASS ACTION

**DECLARATION OF SHANNON
BOSTIC IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Joanna Ghosh); Declaration of
Defendant (John Maceri); Declaration of
Proposed Settlement Administrator (Eric
Springer); and [Proposed] Order filed
concurrently herewith]

Date: February 8, 2023
Time: 9:00 a.m.
Department: SSC17

Complaint Filed: February 24, 2021
FAC Filed: May 12, 2022
Trial Date: None Set

DECLARATION OF SHANNON BOSTIC

I, **Shannon Bostic**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case and in *Shannon Bostic v. Lamp Community, et al.*, Case No. 21CMCV00097, which is being resolved along with 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 The People Concern, successor by merger to Lamp, Inc. dba Lamp Community (“The People Concern”) as an hourly-paid, non-exempt employee, from approximately November 2015 to approximately July 2020. I decided to seek legal advice about my experiences with The People Concern about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure The People Concern paid me and other employees what was owed to us and stopped its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **8 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **9 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and PAGA representative.

3. I have spent over **14 hours** communicating with my attorneys regarding the cases and fulfilling my responsibilities as both a class and PAGA representative, which included gathering documents concerning my employment with The People Concern, 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 The People Concern. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional

1 information that I had obtained.

2 4. Throughout the cases, I was available to answer any questions my attorneys had,
3 and available to speak and meet with my attorneys whenever they needed me. I responded to
4 them as quickly as possible and gave them as much information and identified as many
5 documents as I could. I spent at least **12 additional hours** speaking with my attorneys about the
6 cases, identifying potential witnesses, providing my attorneys with documents and information
7 concerning the cases, and also describing policies, practices, and procedures of The People
8 Concern.

9 5. As far as the settlement is concerned, I was available to review documents and
10 answer any questions my attorneys had. I spent about **2 hours** reviewing the settlement
11 agreement and about **4 hours** asking questions and discussing the potential settlement with my
12 attorneys before signing the settlement agreement.

13 6. I believe that I have done everything that my attorneys have asked of me and have
14 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
15 and the State of California. I think my efforts helped to get the result obtained in these cases,
16 and as a class and PAGA representative, I respectfully request that the Court award me an
17 enhancement payment in the amount of \$15,000.00 for my active participation in the cases.
18 Taking into consideration the time that I have dedicated to these cases, I believe that this amount
19 is reasonable.

20 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

21 8. I have not entered into any undisclosed agreements, nor have I received any
22 undisclosed compensation in these cases. The only compensation I will receive is whatever
23 amount the Court awards as an enhancement payment, my share of the settlement as a class
24 member and aggrieved employee, and the payment I will receive in connection with the separate
25 confidential individual settlement and release I entered into with The People Concern.

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

3 Executed this ^{09/22/2022} ____ day of September 2022, at Los Angeles, California.

4 Electronically Signed 2022-09-22 15:44:56 UTC - 172.58.17.229
Shannon Bostic
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