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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

SALIM BENYAHIA, 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.

PROGUARD SECURITY SERVICES, INC., An
unknown business entity; and DOES 1 through
100, inclusive,

Defendants.

KALAINA DULA, individually, and on behalf
of other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

PROGUARD SECURITY SERVICES, INC., An
unknown business entity; and DOES 1 through
100, inclusive,

Defendants.

Case No.: RG20068496
Consolidated with case no. RG21107609

Honorable Noël Wise
Department 21

CLASS ACTION

**DECLARATION OF KALAINA DULA IN
SUPPORT OF PLAINTIFFS' MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT (CAL. LABOR CODE § 2698,
ET SEQ.) SETTLEMENT AGREEMENT,
DISMISSAL OF PLAINTIFF BENYAHIA'S
INDIVIDUAL CLAIMS WITH PREJUDICE,
DISMISSAL OF CLASS CLAIMS WITHOUT
PREJUDICE, AND AWARD OF
ATTORNEYS' FEES AND COSTS,
GENERAL RELEASE FEES, AND
SETTLEMENT ADMINISTRATION COSTS**

Date:
Time:
Department: 21

Benyahia Action Filed: July 22, 2020
Dula Action Filed: June 25, 2021
Trial Date: None Set

DECLARATION OF KALAINA DULA

I, **Kalaina Dula**, 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 Proguard Security Services, Inc. ("Defendant") from approximately June 2020 to approximately August 2020 as a non-exempt, hourly-paid employee. I decided to seek legal advice about my work experiences with Defendant and 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 Defendant paid me and other employees what was owed to us and was held accountable for 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 representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately **4 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **9 hours** discussing my situation, representative action lawsuits under the Private Attorney general Act ("PAGA"), and what it meant to bring a PAGA Action.

3. I have spent over **12 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, providing information regarding the duties of hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. 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 information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had and was 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 Defendant.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about **4 hours** reviewing the settlement agreement and about **2 hours** 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 have tried, to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case, and as a PAGA representative.

7. I respectfully request that the Court award me a general release fee in the amount of \$10,000.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case and my entering into a general release of claims, I believe that this amount is reasonable.

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

9. 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 whatever amount the Court awards as a general release fee, as well as my share of the settlement as an aggrieved employee.

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

Executed this 8th day of July 2024, at Merced, California.

Electronically Signed _____ 2024-07-08 19:19:04 UTC - 172.59.144.13

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Kalaina Dula