

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
Nicholas Rosenthal (State Bar No. 268297)
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, Esq. (State Bar No. 170131)
Polaris Law Group
501 San Benito Street, Suite 200
Hollister, CA 95023
Tel: (831) 531-4214
Fax: (831) 634-0333

Attorneys for Plaintiff and the Class

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

IKEYEE JACKSON, as an individual and
on behalf of all others similarly situated,

Plaintiffs,

vs.

SAMUEL, SON & CO. (USA) INC., a
Delaware corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: CVRI2101679

(Assigned to the Honorable Harold Hopp, Dept.
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**DECLARATION OF IKEYEE JACKSON
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: June 5, 2023
Time: 8:30 a.m.
Dept.: 10

Complaint Filed: March 30, 2021

DECLARATION OF IKEYEE JACKSON

I, Ikeyee Jackson, 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 have been employed by Defendant Samuel, Son & Co. (USA) Inc. ("Defendant") as a non-exempt, hourly employee since about May 2017. During my employment, the wage statements I received from Defendant from November 2020 until approximately June 2021 did not accurately identify the hourly rates or hours worked for shift differential/shift premium work performed.

3. Prior to and subsequent to the filing of this lawsuit, I met with my attorneys to discuss the status of the case, provide information and documents to my attorneys, and assist my attorneys in gathering evidence to support the class claims. I consulted with my counsel regarding settlement negotiations and approved the settlement. I also reviewed numerous documents related to the case, including the Complaint, the settlement agreement, and my declarations in support of approval.

4. Thus, I have been actively involved in this litigation. I would estimate in total I have spent 25 hours assisting in the prosecution of this matter.

5. I understand that this action was brought on behalf of other similarly situated employees of Defendant in the State of California, and thus I am acting as a representative for the Class. As the class representative, I understand that it is my responsibility to act in the Class's best interest and not my own. I agree that I will not put my own interests ahead of that of the Class. Moreover, I am not aware of any conflicts that exist between my interest and the interests of the Class that would impair or affect my ability to serve as representative for the Class.

6. I have and continue to be willing to assist in the investigation of this matter as well as make myself available for trial or any further proceeding in this matter as required to represent the interests of the Class. I also understand my duties and responsibilities to the

1 proposed class and will carry out those duties as necessary.

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

5 8. I am aware and have been aware from the inception of the case, that there is the
6 risk that if I do not win my case, then I could be liable for Defendant's litigation fees and costs. I
7 also understand that filing a case on my own behalf could have involved fewer costs and
8 resolved faster than filing a class action. I accepted that risk in this case. Further, I believed and
9 continue to believe that there is risk to me because I remain a current employee of Defendant.
10 My understanding is that typically class action cases are brought by former employees of a
11 company who cannot be retaliated against. However, to be clear, as of the signing of this
12 declaration I am not aware of any retaliatory actions taken against me by Defendant.

13 9. I also understood that filing this lawsuit is a public record and I accepted that
14 burden. As such, I risked my future employment in order to bring this action. Moreover, this
15 lawsuit, which is a public record, is something that potential employers can look into, and which
16 may negatively impact my future employment prospects.

17 10. I understand that because of my actions, many others have benefited by this case.
18 I feel that I took upon myself the risk of this lawsuit and achieved a result for my other former
19 co-workers who did not have to file suit.

20 11. I have been informed that my share of the class action settlement (not counting
21 any enhancement the Court may award) is \$677.57.

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6 Executed on this 8th day of May, 2023, at Bloomington, California.

DocuSigned by:

**DECLARATION OF IKEYEE JACKSON IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT**