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

KETEMA NELSON, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

SANTINI FOODS, INC., a Texas
Corporation; and DOES 1 through 100,

Defendants.

CASE NO. RG21090890

*[Case assigned for all purposes to the Hon.
Evelio Grillo, Dept. 21]*

**DECLARATION OF KETEMA NELSON
IN SUPPORT OF APPROVAL OF
CLASS ACTION SETTLEMENT**

Action Filed: March 4, 2021

Trial Date: None Set

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I, Ketema Nelson, declare as follows:

1. I am an individual over the age of 18 and am the named Plaintiff in this matter.

This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Santini Foods, Inc. (“Santini”) in California from September 29, 2020, to October 30, 2020. My primary job duties included boxing items and cleaning the warehouse in San Lorenzo, California.

3. Throughout my employment, I regularly received bonuses in addition to my hourly wages. It is my understanding that Santini did not include the value of bonuses when determining my overtime rate. I was also regularly required to work 7 days a week as Santini did not always schedule me with at least one day off. I was also required to delay my meal and rest breaks until work was less busy and urgent pallets were unloaded. I often had to wait for other employees to come back from a break before I could go.

4. I started this lawsuit against Santini because I wanted Santini to comply with the law and treat its employees fairly. I feel that I have taken on a greater burden than any of the other employees because I have been actively involved in the litigation, and because it is my name that is attached to the lawsuit. Even though I understood that this lawsuit would be a public record, I accepted that burden for the benefit of my coworkers.

5. I have been actively involved in this case since before it was filed. Some of the tasks I have performed include, gathering relevant documents for use in the lawsuit, providing factual information regarding the claims and Santini's practices to my attorneys, and helping identify other employees who also experienced the same issues that I did. I have held many meetings with my attorneys to discuss these issues and I estimate that I have spent at least 15 total hours on these activities.

1 I declare under penalty of perjury under the laws of the state of California and the United
2 States that the foregoing is true and correct. Executed on Feb 10, 2022, in Oakland,
3 California.

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K.Nelson (Feb 10, 2022 11:27 PST)

Ketema Nelson