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

TASHA COLE, as an individual and on behalf
of all others similarly situated,

Plaintiff,

vs.

NORTHCENTRAL PIZZA, LLC, a California
corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 34-2021-00299158-CU-OE-GDS

**DECLARATION OF TASHA COLE IN
SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION TO APPROVE
SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE
ATTORNEYS GENERAL ACT**

Date: July 12, 2022

Time: 9:00 a.m.

Dept.: 54

Reservation No.: 2649437

Complaint Filed: April 21, 2021

Trial Date: None Set

DECLARATION OF TASHA COLE

I, Tasha Cole, declare as follows:

1. I am an individual over the age of 18. I am the named Plaintiff in the above-referenced 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 was employed by Defendant Northcentral Pizza, LLC ("Defendant") from about January 3, 2020, to about August 18, 2020. I worked in the position of Assistant Manager at Defendant's location in Sacramento, California. Throughout my employment with Defendant, I worked as a non-exempt, hourly employee.

3. During my employment with Defendant, I was required to work through my meal and rest breaks. Because of scheduling and staffing issues, I was often not allowed to take my full rest breaks and/or my full meal breaks. However, I never received extra pay for having to take shorted meal and/or rest periods.

4. Additionally, I understand that I did not receive accurate wage statements from Defendant. Whenever overtime and/or double time wages were paid to me, the overtime and/or double time hourly rates of pay were incorrectly displayed on the wage statements.

5. I understand that the claims alleged in this action were brought on behalf of other aggrieved employees who worked for Defendant. I do not have any interests that are adverse to the other employees that are part of the PAGA settlement.

6. I have spent a significant amount of time discussing this matter with my attorneys on many occasions and explaining my understanding of Defendant's practices. To date, I have performed a number of tasks in my role as the representative. This includes the following:

- a. Discussing this case and the facts involved with my attorneys on numerous occasions, including numerous telephonic meetings at various stages of the lawsuit;
- b. Search for and documents related to this lawsuit, including my pay stubs, work schedules, employment documents, and various other policy

documents from Defendant;

- c. Reviewing pleadings and documents in this lawsuit, including my PAGA letter, the complaint, the PAGA settlement agreement, and my declaration;
- d. Regular providing information to my attorneys and responding to any questions;
- e. Remain available during mediation; and
- f. Reviewing and executing the PAGA settlement agreement.

In total, I have spent approximately 22 to 25 hours in connection with this lawsuit.

7. I have reviewed the PAGA settlement agreement and I believe that the settlement is in the best interest of all aggrieved employees who worked for Defendant. I believe the proposed settlement is reasonable and fair, and adequately compensates the employees for the claims alleged in the complaint.

8. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive accomplishment and understand that other people will benefit because of the actions that I have taken.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May ¹⁷¹⁷¹ __, 2022, at Sacramento, California.


Tasha Cole (May 17, 2022 23:13 PDT)

Tasha Cole