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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

TIFFANY ROBINSON, on behalf of the State of
California and other aggrieved persons,

Plaintiff,

vs.

WILLIS TOWERS WATSON US LLC, a
Limited Liability Company; and DOES 1
through 10, inclusive,

Defendants.

Case No.: 37-2021-00036978-CU-OE-CTL

*[Assigned for All Purposes to the Honorable
Loren G. Freestone, Dept. C-64]*

**DECLARATION OF TIFFANY
ROBINSON IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Final Approval Hearing:

Date: September 24, 2026

Time: 10:30 a.m.

Dept.: C-64

Complaint filed: August 27, 2021

FAC filed: September 19, 2023

Trial date: Not set

DECLARATION OF TIFFANY ROBINSON

I, Tiffany Robinson, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness. I submit this declaration in support of my Motion for Final Approval of Class Action and PAGA Settlement.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

2. When I decided to become involved in this lawsuit as a class representative on behalf of other employees of Defendant Willis Towers Watson US LLC (“Defendant”) and as a private attorney general for the State of California, I understood that I was not only seeking unpaid wages and penalties on behalf of myself, but also for other employees who worked for Defendants, and that by doing so, I would be delaying more immediate recovery available to me through the Labor Commissioner’s office.

3. I was also made aware that being a class representative and private attorney general in an action filed on behalf of others would subject me to a stigma that is sometimes associated with those who bring these kinds of lawsuits. I was aware that, as a class representative and private attorney general, I might be responsible for some or all of Defendant’s legal costs if the case was not successfully concluded. Even with knowledge of these risks, I was willing to go forward and to act on behalf of the other employees and the State of California, but I was nervous about losing and having a judgment filed against me for costs or losing job opportunities in the future.

4. I understood that there were risks involved in class and representative action lawsuits. I understood that the lawsuit could continue for several years and require my services and attention throughout the entire length of the lawsuit. I learned that even if we won at trial, the case could be further delayed by appeals.

Notoriety and Personal Difficulties Encountered

5. As the named plaintiff, I am the face of the litigation. Additionally, the class notice that was mailed in this case was sent to over 200 current and former employees of Defendants. The notice informed all these employees that I filed a class and representative

1 action against Defendants. Exposing myself to this kind of publicity creates a risk for my future
2 career prospects, since current and former employees of Defendants may move to different
3 companies within the industry or may know people at other companies within industry who may
4 not want to hire someone who sued her employer.

5 **Amount of Time and Effort Spent and Duration of the Litigation**

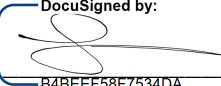
6 6. I have spent a substantial amount of time and effort on this litigation. My work
7 on this case has included, among other things, searching for documents related to my
8 employment with Defendants, discussing my experiences working for Defendants, keeping in
9 regular contact with my attorneys regarding the status of the case, helping my attorneys prepare
10 for mediation, being on-call for my attorneys on the day of mediation in case questions or
11 concerns arose during mediation, and participating in settlement discussions. After mediation,
12 I remained actively involved by reviewing the settlement papers and contacting my counsel for
13 updates. I estimate that since I retained my counsel in January 2021, I have spent approximately
14 55 hours on the activities described above. And I estimate that I will spend an additional 1-5
15 hours assisting my attorneys through the approval process and staying up to date with the case
16 through disbursement of the settlement checks

17 **Personal Benefit Received as a Result of the Litigation**

18 7. Absent the requested service payment, the personal benefit I will receive is the
19 same as all other employees. But unlike the other employees, I have signed a general release for
20 Defendants. The other employees are only releasing the wage and hour claims asserted in the
21 lawsuit.

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

24 Executed on 8/19/2026, at Escondido, California.

25
26 DocuSigned by:

27 B4BEEF58E7534DA...
Tiffany Robinson
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