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Attorneys for Plaintiff and the Class

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

DOUGLAS WALKER, as an individual and on
behalf of all others similarly situated, and as a
private attorney general,

Plaintiff,

vs.

PEET'S COFFEE, INC., a Virginia corporation
limited liability company; and DOES 1 through
50, inclusive,

Defendants.

Case No. RG21095499

[Hon. Brad Seligman, Department 23]

**DECLARATION OF DOUGLAS WALKER
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: March 14, 2023
Time: 3:00 p.m.
Department: 23

Reservation ID: 523939917519

Complaint Filed: September 23, 2020

1 I, Douglas Walker, declare as follows:

2 1. I am an individual over the age of 18. I am the named plaintiff in the above-reference
3 action. I have personal knowledge of the facts set forth below, except as to those matters stated on
4 information and belief and, as to those matters, I believe them to be true. If called as a witness, I could
5 testify competently as to the matters stated in this declaration.

6 2. I began working for Peet's Coffee, Inc. in or about August of 2014. Throughout my
7 employment, I received wage statements that do not show all applicable hourly rates of pay, including
8 overtime rates, or the "Period End" date. I cannot determine from the wage statements whether I was
9 properly paid. For example, I cannot determine whether my "General Bonus" or "Covid Bonus OT"
10 earnings were properly compensated.

11 3. I have taken all necessary steps to represent the interests of the Class, including by
12 providing information and documents to my counsel, discussing the claims and lawsuit with my counsel,
13 and answering any questions that have come up, including about how I was paid or what my wage
14 statements show or meant. I understand that I am responsible to the Class with respect to trying the case,
15 appearing in court, and working with Class Counsel. I am willing to act as a fiduciary for the Class. I
16 remain willing to devote my time to this lawsuit for the benefit of the Class. I do not believe I have any
17 interests that are adverse to the interests of the Class. I also am unaware of any such issues having been
18 raised or presented by anyone else.

19 4. I believe many employees would not sue their employer out of fear. I took on risks by
20 bringing this lawsuit, and I understand that other people will benefit because of the actions that I have
21 taken. I feel that it is a positive accomplishment, am proud of the result, and believe that the class
22 settlement is fair, adequate, and reasonable.

23 I declare under penalty of perjury under the laws of the State of California that the foregoing is
24 true and correct. Executed this 10th day of February 2023, at Modesto, California.

25 DocuSigned by:

26 *Douglas Walker*

27 ADA9A42371C04B4...

28 Douglas Walker