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Attorneys for Plaintiff

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

DEKEISHA LINDSEY, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

WC LOGISTICS, INC., a California corporation;
AIT WORLDWIDE, INC., an unknown business
entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: RG21109457

Honorable Michael Markman
Department 23

**DECLARATION OF DEKEISHA MARIE
LINDSEY IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL. LABOR
CODE § 2698, *ET SEQ.*) SETTLEMENT
AGREEMENT AND AWARD OF
ATTORNEYS' FEES AND COSTS, GENERAL
RELEASE FEE, PAGA REPRESENTATIVE
RELEASE FEE, AND SETTLEMENT
ADMINISTRATION COSTS**

DEKEISHA LINDSEY, individually, and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act;

Plaintiff,

vs.

WC LOGISTICS, INC., a California corporation;
AIT WORLDWIDE, INC., an unknown business
entity; and DOES 1 through 100, inclusive,

Defendants.

Reservation ID: 757838649372
Date: March 18, 2025
Time: 10:00 a.m.
Department: 23

Complaint Filed: August 16, 2021
FAC Filed: November 29, 2021
SAC Filed: August 26, 2022
Trial Date: None Set

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1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned cases. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

3. I have spent many hours communicating with my attorneys regarding the cases and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, providing information regarding the duties of aggrieved employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained. As the cases progressed, I was available to answer any questions my attorneys had and was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent many hours speaking with my attorneys about the cases, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendants.

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DECLARATION OF DEKEISHA MARIE LINDSEY

1 Disclosures.

2 5. On November 12, 2018, I appeared for a deposition that lasted approximately over three
3 and a half hours. I spent several hours preparing for the deposition. After the deposition, I spent at
4 least a couple hours reviewing my testimony and discussing the contents of the deposition transcript
5 with my attorneys.

6 6. As far as the settlement is concerned, I was available to review documents and answer
7 any questions my attorneys had. I spent several hours reviewing the settlement agreement, asking
8 questions, and discussing the potential settlement with my attorneys before signing the settlement
9 agreement.

10 7. I believe that I have done everything that my attorneys have asked of me and have tried,
11 to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think
12 my efforts helped to get the result obtained in this case.

13 8. I have agreed to dismiss my individual claims asserted in the action entitled *Dekeisha*
14 *Lindsey v. WC Logistics, Inc; AIT Worldwide Logistics, Inc.*, Alameda Superior Court Case No.
15 RG21109457 ("Class Action") with prejudice.

16 9. I am not receiving any consideration for dismissing the class claims in the Class Action
17 without prejudice.

18 10. For my broader individual waiver and release of claims with a California Civil Code
19 Section 1542 waiver (set forth in Section 10 of the Settlement Agreement), the Settlement provides for
20 a General Release Fee in the amount of up to \$20,000.00 and for my work in the actions the Settlement
21 provides for a PAGA Representative Release Fee in the amount of up to \$5,000.00, to be paid out of
22 the Total Settlement Amount, subject to Court approval. I respectfully request that the Court award me
23 full payment of the General Release Fee and PAGA Representative Release Fee.

24 11. I am not related to anyone associated with Lawyers *for* Justice, PC.

25 12. I have not entered into any undisclosed agreements, nor have I received any undisclosed
26 compensation in this case. The only compensation I will receive is whatever amount the Court awards
27 me for the General Release Fee and PAGA Representative Release Fee, as well as my share of the
28 settlement as an aggrieved employee.

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

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4 Executed on 02/19/2025, at Los Angeles, California.

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