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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

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

Plaintiff,

vs.

CBRE, INC. a Delaware corporation; CBRE
GROUP, INC., a Delaware corporation; and
DOES 1 through 100, inclusive ,

Defendants.

Case No.: 21TRCV00543

Honorable Ronald F. Frank
Department 8

**DECLARATION OF TENAYA JACKSON 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,
ENHANCEMENT PAYMENT, AND PAGA
SETTLEMENT ADMINISTRATION COSTS**

Date: November 5, 2024
Time: 9:00 a.m.
Department: 8

Complaint Filed: July 26, 2021
Trial Date: None Set

DECLARATION OF TENAYA JACKSON

I, **TENAYA JACKSON**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. 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.

2. I was employed by CBRE, INC. and CBRE GROUP, Inc. (“Defendants”) from approximately June 2015 to approximately December 2020 as a non-exempt, hourly-paid employee. I decided to seek legal advice about my work experiences with Defendants and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants paid me and other employees what was owed to us and was held accountable for their practice of not properly compensating their employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately **7 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **15 hours** discussing my situation, representative action lawsuits under the Private Attorney General Act (“PAGA”), and what it meant to bring be a PAGA representative.

3. I have spent over **22 hours** communicating with my attorneys regarding the case 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 hourly-paid and non-exempt 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.

4. As the case 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 at least **11 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendants.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about **11 hours** reviewing the settlement agreement and about **8 hours** asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case. I respectfully request that the Court award me an Enhancement Payment in the amount of \$12,500.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

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

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

10/10/2024

Executed this ____ day of October 2024, at Inglewood, California.

Electronically Signed 2024-10-11 00:30:36 UTC - 23.242.102.5

Tenaya Jackson

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Tenaya Jackson