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

CHRISTIANE LANGE APPLGATE, as  
 an individual and on behalf of all others  
 similarly situated,

Plaintiff,

vs.

SEED BEAUTY, LLC, a California  
 limited liability company; COLOUR POP  
 DISC COMPANY, a California  
 corporation; and DOES 1 through 50,  
 inclusive,

Defendants.

Lead Case No.: 56-2021-00555658-CU-OE-VTA  
 (Consolidated with 56-2021-00556344-CU-OE-  
 VTA & 56-2021-00560437-CU-OE-VTA)

(Assigned for all purposes to the Hon. Benjamin F.  
 Coats, Department 43)

**DECLARATION OF CHRISTIANE LANGE  
 APPLGATE IN SUPPORT OF PLAINTIFFS’  
 MOTION TO APPROVE SETTLEMENT  
 AGREEMENT PURSUANT TO THE  
 PRIVATE ATTORNEYS GENERAL ACT**

Date: April 3, 2024

Time: 8:30 a.m.

Dept.: 43

1                                    **DECLARATION OF CHRISTIANE LANGE APPEGATE**

2                    I, Christiane Lange Applegate, declare as follows:

3                    1.        I am an individual over the age of 18. I am the named Plaintiff in the above-  
4 referenced action. I have personal knowledge of the facts set forth below and if called to testify I  
5 could and would do so competently.

6                    2.        I worked for Seed Beauty, LLC and Colour Pop Disc Company as a non-exempt,  
7 hourly employee from in or about August 2019, to in or about March 2020, and from on or about  
8 September 14, 2020, to on or about October 27, 2020.

9                    3.        During my employment with Defendants, I was required to undergo security  
10 check-in procedures before I clocked in for work and check-out procedures after I had clocked  
11 out. I alleged that I was not paid for the time spent undergoing the check-in and check-out  
12 procedures. I was also required to undergo the security check-in/out procedure before taking my  
13 lunch breaks and before returning to work from lunch. As such, I allege that I was not paid all  
14 wages earned for all hours worked.

15                   4.        During my employment with Defendants, I was not paid premium compensation  
16 in lieu of any missed and/or interrupted meal breaks.

17                   5.        To date, I have not received the unpaid wages owed to me.

18                   6.        Given the violations listed above, I believe that the wage statements that were  
19 issued to me by Defendants were inaccurate.

20                   7.        I understand that the claims alleged in this action were brought on a representative  
21 basis on behalf of other aggrieved employees who worked for Defendants. I do not believe I  
22 have any interests that are against the other employees that are part of the PAGA settlement.

23                   8.        I have spent a significant amount of time discussing this matter with my attorneys  
24 on many occasions and explaining my understanding of Defendants' practices. To date, I have  
25 performed a number of tasks in my role as the representative, including, discussing this case and  
26 the facts involved with my attorneys, searching for and providing documents pertaining to the  
27 case to my attorneys, reviewing the files and pleadings, including my paystubs and employment  
28 records, my PAGA letter, the complaint, and the Settlement Agreement, remaining available

1 during the mediations, and responding to any questions from my attorneys on a regular basis. In  
2 total, I estimate that I have spent roughly 30 hours in connection with the prosecution of this  
3 lawsuit.

4 9. I have reviewed the Settlement Agreement and I believe that the settlement is in  
5 the best interest of all aggrieved employees who worked for Defendants. I believe the proposed  
6 settlement is reasonable and fair, and adequately compensates the employees for the violations  
7 alleged in the complaint.

8 10. I am aware and have been aware from the inception of the case, that there is the  
9 risk that if I do not win my case, then I could be liable for Defendants' litigation costs. I  
10 accepted that risk in this case.

11 11. I also understood that filing this lawsuit is a public record and I accepted that  
12 burden. As such, I risked my future employment in order to bring this action. Moreover, this  
13 lawsuit, which is a public record, is something that potential employers can look into, and which  
14 may cause a negative impact of my employment prospects.

15 12. I am proud of the result and accomplishment of this lawsuit. I feel that it is a  
16 positive accomplishment of this lawsuit and understand that other people will benefit because of  
17 the actions that I have taken. I feel that I took upon myself the risk of this lawsuit and achieved a  
18 result for my other former co-workers who did not have to file suit.

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

21 Executed on this 7<sup>th</sup> day of March 2024, at Ventura, California.

22 DocuSigned by:  
23 *Christiane Lange Applegate*  
24 53A0F8C1B6D84CA...  
25 Christiane Lange Applegate  
26  
27  
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