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

CHRISTIANE LANGE APPELATE, 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)

Complaint Filed: June 25, 2021

**DECLARATION OF DORACELI MORALES
IN SUPPORT OF PLAINTIFFS’ MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT (CAL. LAB. CODE § 2698, ET
SEQ.) SETTLEMENT AGREEMENT**

CHRISTIANE LANGE APPELATE, as
an individual and on behalf of aggrieved
employees,

Plaintiff,

vs.

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

Defendants.

[Notice of Motion and Motion for Approval of
Private Attorneys General Act (Cal. Lab. Code §
2698, Et Seq.) Settlement Agreement; and
[Proposed] Order and Judgment filed concurrently
herewith]

Case No. 56-2021-00556344-CU-OE-VTA

Complaint Filed: July 20, 2021

1 DORACELI MORALES, individually, and
2 on behalf of other aggrieved employees
3 pursuant to the California Private Attorneys
4 General Act;

5 Plaintiff,
6 VS.

7 COLOUR POP COSMETICS, LLC, an
8 unknown business entity; SEED BEAUTY,
9 LLC, a California limited liability company;
10 and DOES I through 100, inclusive,
11 Defendants.
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Case No. 56-2021-00560437-CU-OE-VTA

Complaint Filed: November 29, 2021

13 Edwin Aiwarzian (SBN 232943)
14 Joanna Ghosh (SBN 272479)
15 Selena Matavosian (SBN 348044)
16 **LAWYERS for JUSTICE, PC**
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18 Glendale, California 91203
19 Tel: (818) 265-1020 / Fax: (818) 265-1021
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21 *Attorneys for Plaintiff Doraceli Morales*
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I, **Doraceli Morales**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiff in the above-captioned action, and the named plaintiff in the action entitled *Doraceli Morales v. Colour Pop Cosmetics, LLC, et al.*, Ventura County Superior Court Case No. 56-2021-00560437-CU-OE-VTA, which is being resolved with the above-captioned action. 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 Defendant Colour Pop Cosmetics, LLC (“Colour Pop”) from approximately June 2020 to approximately April 2021 as a non-exempt, hourly-paid employee. I decided to seek legal advice about my work experiences at Colour Pop and about filing a lawsuit to seek to redress my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure Colour Pop was held accountable for and stopped its practice of not properly compensating aggrieved 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 5 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost 4 hours discussing my situation, representative action lawsuits under the Private Attorneys General Act (“PAGA”) generally, and what it meant to bring a PAGA action.

3. I have spent over 13 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which has included providing documents concerning my employment with Colour Pop, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Colour Pop. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and to provide them with any additional information that I had obtained.

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4. Throughout the litigation of the matter, I was available to answer any questions my attorneys had, and 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 as I could. I spent at least 8 additional hours speaking with my attorneys about the matter, sending them documents, identifying potential witnesses, and also describing policies, practices, and procedures of Colour Pop.

5. I spent about 2 hours reviewing the settlement agreement and about 2 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 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.

7. I respectfully request that the Court approve and award me a PAGA Representative Award in the amount of \$5,000.00 for my efforts and active participation in the case and broader release of claims. Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

8. 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.

12/12/23
Executed this ____ day of December 2023, at Oxnard, California.

Electronically Signed: 2023-12-12 05:09:48 UTC - 172.56.185.5

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Doraceli Morales