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

MAHO LAZO, individually, and on behalf of all
others similarly situated,

Plaintiff,

v.

PROTERRA OPERATING COMPANY, INC., a
corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No. 21STCV30663

*[Assigned for all purposes to: Hon. Yvette M.
Palazuelos, Dept. 9]*

**DECLARATION OF STEPHANIE
BITETTI IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing Date: October 5, 2023
Hearing Time: 10:00 a.m.
Hearing Place: Department 9

DECLARATION OF STEPHANIE BITETTI

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I, Stephanie Bitetti, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

2. I am a named Plaintiff in this action and submit this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement. Because I believe I have provided invaluable assistance during the course of this case, I am hopeful that the Court will approve my request of a \$7,500 service payment for my role as a Class Representative.

3. I am a former employee of Proterra Operating Company, Inc. ("Proterra"). I worked at Proterra from approximately July 2018 to approximately May 2020 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to Proterra's policies and practices that have been alleged as unlawful in the Class Action Complaint and First Amended Class Action Complaint.

4. I joined this lawsuit because I was concerned that I was not paid properly for all the hours that I worked, and I was not provided all of my meal and rest breaks. While working at Proterra, my coworkers and I were asked to work long hours because of the amount of work, sometimes without taking meal and rest breaks. I also observed my co-workers working long hours without taking breaks.

5. By joining this lawsuit, I hoped that I might be able to change Proterra's policies to better protect the working conditions of my co-workers. I also understood it was my duty as a Class Representative to represent the best interests of the class, know about the lawsuit, help my attorneys, and keep updated on the case.

6. Prior to commencing my initial case, I provided Wilshire Law Firm with a detailed account of the facts related to my employment with Proterra. Additionally, I provided my counsel with documentation in the form of pay statements and other policy documents that applied to my employment with Proterra. Based on my conversations, my attorneys and I were able to identify instances when I was not paid correctly.

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1 7. I have invested a lot of personal time and energy while this lawsuit has been
2 pending. I made it a priority to be actively involved because I wanted to do everything I can to
3 assist my attorneys in prosecuting this case. I regularly communicated with my attorneys and
4 their staff to discuss updates on the case and to provide my attorneys with additional information.

5 8. I spent multiple hours looking for documents that my attorneys asked me to
6 provide to help this case.

7 9. I also made myself available during the mediation for this case and I kept in
8 regular contact with my attorneys before and after the mediation to ensure that any questions the
9 attorneys had could be answered.

10 10. I also reviewed pleadings filed in this case, including the settlement-related
11 documents.

12 11. If the Court requests, I can provide additional information about my adequacy as a
13 class representative for this case. I also intend to file an updated declaration in advance of the
14 motion for final approval hearing.

15 12. I believe the settlement is a good settlement and I would recommend that the
16 Court approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad
17 that I had the opportunity to represent the class in this lawsuit and that I was able to recover
18 money through a settlement for the class. I have also observed my attorneys' work throughout
19 this case and I believe they have been thorough, diligent, prompt, courteous, and professional. I
20 respectfully request that the Court award me a \$7,500 service payment. I am receiving no
21 additional compensation other than the compensation provided for in the settlement. Based on
22 my involvement in this case and the benefits provided to my former co-workers, I can say I
23 helped stand up for the other workers who may have been too afraid to say anything to
24 management because they did not want to risk losing their jobs or risk the stigma of suing an
25 employer. I was not afraid to take that risk because I strongly care about helping out my current
26 and former co-workers. I also continue to fear that any employer may find out that I participated
27 in this lawsuit and hold it against me. In a competitive job market, this factor may weigh heavily
28 against me. Nevertheless, I felt that important rights were at stake that hurt myself and other

employees.

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

Executed on 5/26/2023 at Redmond, Oregon.

DocuSigned by:

Stephanie Bitetti

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Stephanie Bitetti

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