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Attorneys for Plaintiff

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

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

Plaintiff,

vs.

DELTA DENTAL OF CALIFORNIA., a
California corporation; CERTIFIED
EMPLOYMENT GROUP, an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 34-2021-00304117-CU-OE-GDS

Honorable Jill H. Talley
Department 23

**DECLARATION OF KILA TOWNS IN
SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL.
LAB. CODE § 2698, *ET SEQ.*)
SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEYS' FEES AND
COSTS, GENERAL RELEASE FEE,
AND SETTLEMENT
ADMINISTRATION COSTS**

[Notice of Motion and Motion for Approval
of Private Attorneys General Act (Cal. Lab.
Code § 2698, *Et Seq.*); Settlement
Agreement and Award of Attorneys' Fees
and Costs; General Release Fee, and
Settlement Administration Costs;
Declaration of Plaintiff's Counsel (Tara
Zabehi); and [Proposed] Order and
Judgment filed concurrently herewith]

Reservation ID: A-304117-001
Date: June 28, 2024
Time: 9:00 a.m.
Department: 23

Complaint Filed: July 13, 2021
Trial Date: None Set

DECLARATION OF KILA TOWNS

I, **KILA TOWNS**, 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 Delta Dental of California and Certified Employment Group (“Defendants”) in an hourly-paid, Customer Service Representative position from approximately January 2020 to April 2020. I decided to seek legal advice about my work experience with Defendants. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were held accountable and stopped their practice of not properly compensating aggrieved employees. 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 **8 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **18 hours** discussing my situation, representative actions in general, and what it meant to bring an action under the California Private Attorneys General Act (“PAGA”).

3. I have spent over **17 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 and answering their questions, providing information regarding the duties of non-exempt, hourly-paid 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 my most current information and any additional information that I had obtained.

4. 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 and identified as many documents as I could. I spent at least **16 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. I spent about **5 hours** reviewing the settlement agreement and about **3 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 represent and 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 award me a general release fee in the amount of \$10,000.00 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.

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

9. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as a general release fee, as well as my individual share of the settlement as an aggrieved employee.

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

Executed this 1 day of June 2024, at Chico, California.

Electronically Signed
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Kila Towns