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7 Attorneys for Defendant
BARKSDALE, INC.

8
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF LOS ANGELES

11 MAYRA CORTEZ, individually and on behalf of
12 other members of the general public, similarly
situated,

13 Plaintiff,

14 v.
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16 BARKSDALE, INC., a Delaware corporation;
and DOES 1 through 50, inclusive,

17 Defendants.
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Case No. 21STCV29193

ASSIGNED FOR ALL PURPOSES TO
JUDGE CAROLINE B. KUHL, DEPT. 12

**DECLARATION OF MARIE DHAINE IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL**

Complaint Filed: August 9, 2021

1 I, **Marie Dhaine**, declare and state:

2 1. I am a Vice President Human Resources for Barksdale, Inc. I submit this Declaration
3 in support of the Motion for Preliminary Approval of settlement between Plaintiff Mayra Cortez
4 ("Plaintiff") and Defendant Barksdale, Inc. ("Defendant"). I have personal knowledge of the facts set
5 forth herein, or I have knowledge of such facts based on my review and knowledge of the business
6 records and files of Defendant and could testify to the same if called as a witness in this matter.

7 2. I am informed and believe that Barksdale has no connection with the proposed *cy pres*
8 recipient Legal Aid Foundation of Los Angeles. I am not aware of any actual or potential conflict of
9 interest arising from its designation as the *cy pres* recipient in this matter.

10 3. I am informed and believe that there are no other pending legal matters which will be
11 extinguished or adversely affected by the settlement of this matter.

12 4. In my capacity as a VP Human Resources, I am familiar with and have access to the
13 Defendant's business records which are created at or near the time of relevant events, regularly created
14 as part of Defendant's practices and maintained in the ordinary course of business. In preparation for
15 the mediation in this matter, Barksdale prepared a list of current and former employees, and compiled
16 time and payroll records regarding those employees. I understand that the Parties in this action utilized
17 this information to determined that there were approximately 241 non-exempt employees, who worked
18 at total of approximately 30,634 workweeks during the period from August 9, 2017 through February
19 12, 2022. From that date through the proposed close of the Class Period and PAGA period on May
20 31, 2022, Barksdale continued to employ approximately 142 union and 27 non-union class members,
21 which would add roughly 2,700 workweeks to the total number of workweeks at issue in this matter..

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

24 Executed this 28 day of September, 2022, at Los Angeles, California.

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28 MARIE DHAINE

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