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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES - SPRING STREET COURTHOUSE

DOMINIQUE DAVIS, individually, and on
behalf of other members of the general
public similarly situated;

Plaintiff,

v.

BARKER MANAGEMENT, INC., an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Lead Case No.: 21STCV04439
Consolidated Case No.: 21STCV33269

Honorable William F. Highberger
Department SSC10

CLASS ACTION

**DECLARATION OF DOMINIQUE DAVIS
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF JOINT
STIPULATION OF CLASS ACTION AND
PAGA SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND ENHANCEMENT
PAYMENT**

[Notice of Motion and Motion for Final
Approval of Joint Stipulation of Class Action
and PAGA Settlement, Attorneys' Fees and
Costs, and Enhancement Payment; Declaration
of Class Counsel (Edwin Aiwazian);
Declaration of Settlement Administrator (Yami
Burns); and [Proposed] Final Approval Order
and Judgment filed concurrently herein]

Date: August 30, 2023
Time: 11:00 a.m.
Department: SSC10

Complaint Filed: February 4, 2021
Trial Date: None Set

DECLARATION OF DOMINIQUE DAVIS

I, **Dominique Davis**, 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 Barker Management, Inc. (“Barker Management”) in an hourly-paid, non-exempt property position from September 2018 to August 2020. I decided to seek legal advice about my work experiences with Barker Management. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Barker Management was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 8 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 6 hours discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and eventually a PAGA representative.

3. I have spent over 15 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Barker Management, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance regarding the duties of hourly and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Barker Management. I routinely checked in with my attorneys and their staff to make sure that they had all of 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

1 spent at least 10 additional hours speaking with my attorneys about the case, identifying potential
2 witnesses, providing my attorneys with documents and information concerning the case, and also
3 describing policies, practices, and procedures of Barker Management.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I spent about 3 hours reviewing the settlement
6 agreement and about 2 hours asking questions and discussing the potential settlement with my
7 attorneys before signing the settlement agreement.

8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
10 and the State of California. I think my efforts helped to get the result obtained in this case, and
11 as a class and PAGA representative, I respectfully request that the Court award me an incentive
12 award in the amount of \$12,500.00 for my active participation in this case. Taking into
13 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

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

15 8. I have not entered into any undisclosed agreements, nor have I received any
16 undisclosed compensation in this case. The only compensation I will receive is whatever amount
17 the Court awards as an enhancement award, as well as my share of the settlement as a class
18 member and as an aggrieved employee.

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 this 2/1 day of February 2023, at Compton, California.

22 Electronically Signed 2023-02-02 05:40:40 UTC - 72.193.172.129
Dominique Davis
Nintex AssureSign® c3c52194-6d9d-4ada-818f-aff0c013e0773

23 Dominique Davis