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

NAKITA CLARK, DAWN STEPHENSON,
individually, and on-behalf of other members
of the general public similarly situated and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiffs,

v.

WITTMAN ENTERPRISES, LLC, a
California limited liability company; and
DOES 1 through 100, inclusive.,

Defendants.

Case No.: 34-2019-00251989-CU-OE-GDS

Honorable Jill H. Talley
Department 25

CLASS ACTION

**DECLARATION OF DAWN
STEPHENSON IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement;
Declaration of Class Counsel (Edwin
Aiwaizian); Declaration of Class
Representative (Dawn Stephenson);
Declaration of Administrator (Stephen
Gomez); and [Proposed] Order filed
concurrently herewith]

Date: June 2, 2023
Time: 9:00 a.m.
Department: 25

Complaint Filed: March 6, 2019
FAC Filed: March 29, 2019
SAC Filed: July 18, 2019
TAC Filed: February 4, 2022
Trial Date: None Set

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I, **Dawn Stephenson**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs 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 Wittman Enterprises, LLC (“Wittman”) in an hourly-paid position, from August 6, 2007 to July 3, 2018. I decided to seek legal advice about my work experiences with Wittman. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Wittman paid me and other employees what was owed to us for all hours worked and non-compliant meal and rest breaks, and held accountable. After speaking with the attorneys, I investigated class action and representative lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 5 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 6 hours discussing my situation, class action and Private Attorneys General Act (“PAGA”) lawsuits in general, and what it meant to join the lawsuit, be a named plaintiff, class representative, and eventually a PAGA representative.

3. I have spent over 14 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a named plaintiff and class and PAGA representative, which included gathering documents concerning my employment with Wittman, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of hourly-paid, non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Wittman. I routinely checked in with my attorneys and their staff to make sure that they were updated with my most current information and to provide them with any additional information that I had obtained.

4. Since becoming involved in this 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 and identified as

1 many documents as I could. I spent at least 10 additional hours speaking with my attorneys
2 about the case, identifying potential witnesses, providing my attorneys with documents and
3 information concerning the case, and also describing policies, practices, and procedures of
4 Wittman. During the discovery phase of the litigation, I spent approximately 8 additional hours
5 reviewing Wittman's discovery requests, locating documents, and providing documents,
6 responses to my attorneys.

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

11 6. I believe that I have done everything that my attorneys have asked of me and have
12 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
13 and the State of California. I think my efforts helped to get the result obtained in this case, and
14 as a class and PAGA representative, I respectfully request that the Court award me an
15 enhancement payment in the amount of \$7,500.00 for my active participation in this case.
16 Taking into consideration the time that I have dedicated to this case, I believe that this amount is
17 reasonable.

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

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

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

25 Executed this ^{08/22/2022} ____ day of August 2022, at Roseville, California.

26 Electronically Signed
Dawn Stephenson
Hinter: AssureSign®

27 Dawn Stephenson