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Attorneys for Plaintiffs

**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
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Yasmin Hosseini); Declaration of
Proposed Class Representative (Nakita
Clark); and [Proposed] Order filed concur-
rently herewith]

Date: November 15, 2022
Time: 1:30 p.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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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 2022-08-22 18:33:00 UTC - 172.58.36.150
Dawn Stephenson
Hinter AssureSign® aaf3ff16e-79bc-41cf-8d3d-ae901208b46

27 Dawn Stephenson