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Attorneys for Plaintiff CIDA BENG, on behalf of
 herself and others similarly situated

[Additional Counsel on Following Page]

**SUPERIOR COURT OF CALIFORNIA
 COUNTY OF LOS ANGELES**

CIDA BENG, on behalf of herself
 and all others similarly situated,

Plaintiff,

v.

SAS MANAGEMENT STORES, INC., a
 California corporation; SAS C-STORES INC.,
 a California corporation; S&S PETROLEUM,
 INC., a Washington corporation; and DOES 1
 to 10, inclusive

Defendants.

CASE NO.: 21STCV45479

(Assigned to Hon. Kenneth R. Freeman,
 Dept. 14)

CLASS ACTION

**DECLARATION OF PLAINTIFF CIDA
 BENG IN SUPPORT OF MOTION FOR
 PRELIMINARY APPROVAL OF CLASS
 ACTION AND PAGA SETTLEMENT**

DATE: May 20, 2024

TIME: 10:00 a.m

DEPT.: 14

Complaint filed December 14, 2021

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DECLARATION OF CIDA BENG

I, Cida Beng, declare as follows:

1. I am a resident of Los Angeles County, California. I am a former employee of SAS Management Stores, Inc., a California corporation (hereinafter “SAS” or “Defendant”) and the named plaintiff in this case. I am over the age of eighteen. As such, I have personal knowledge of, or am informed and believed, the following facts herein stated. If called as a witness, I could and would testify competently to the following:

2. I am familiar with the work involved in prosecuting the class action against my former employer and I worked closely with my attorneys in prosecuting the action and in obtaining the relief provided by the settlement. I am familiar with the investigation and discovery conducted, settlement discussions, and have participated in all stages of the litigation.

3. I am not aware of any conflicts that would prevent me from serving as a class representative in this matter. I do not have any personal or business relationships with any of my attorneys (other than retaining them to represent me in this case).

JOB DUTIES AND EXPERIENCES

4. I worked as an hourly-paid, non-exempt employee for Defendant during the class period in Los Angeles County. My employment began in approximately June 2020 and ended in approximately October 2020.

5. My job duties included working as a “cashier.”

6. While working for the Defendant I was not paid for all the hours that I worked, including overtime wages.

7. Additionally, I was routinely denied the ability to use my meal periods for my own purposes and was required to stay on the premises.

8. Defendant’s company-wide practices included understaffing and assigning heavy workloads, which prevented me from taking a ten-minute rest period for each four-hour period worked.

9. I was also not reimbursed for necessary business expenses I made.

1 10. During the entire period of my employment with Defendant, my paycheck stubs were
2 not accurate because they did not reflect gross wages earned, net wages earned, all applicable hourly
3 rates, or applicable deductions as a result of Defendant not compensating me for all hours that I worked.
4 The lack of this information on my paycheck stubs subjected me to the difficulty of having to
5 reconstruct the hours I actually worked, and compensation earned during a pay period.

6 **DUTIES AS A CLASS REPRESENTATIVE**

7 11. This lawsuit is not an individual lawsuit. It is a proposed class action. I understand
8 that, if approved as a class representative in this matter, I have an obligation to do my best to look out
9 for the interests of other class members, the current and former employees of Defendant who I am
10 seeking to represent. I understand that my obligations to the class exist even when the class is certified
11 solely as part of a class action settlement. It is my understanding that, as one part of this duty to the
12 class, I cannot agree to a settlement to benefit myself to the exclusion of the rest of the class members. I
13 have never asked my attorneys to simply settle this matter at any cost. Rather, I have asked them to
14 obtain the best settlement they could within reason, and I believe that they have attempted to do so.

15 12. This case was filed over two years ago. I have never asked to be relieved from my role as
16 a proposed class representative. To the contrary, I have made myself available whenever my
17 attorneys wanted to discuss aspects of my employment with Defendant, and I remain committed to
18 seeing this matter through to the end.

19 13. I have talked with my attorneys about the settlement proposed in this case. I am not an
20 accountant, but I understand the factors and risks considered when evaluating a settlement.

21 14. Summing it all up in the simplest terms, I am asking to be a stand-in for other
22 employees of Defendant. Because of that, I cannot quit on the Class, and I cannot put myself and my
23 interests before the class. I accept these duties and request that I be approved as the class representative
24 for purposes of this settlement

25 **COMMUNITY OF INTEREST: TYPICALITY AND ADEQUACY**

26 15. I was an hourly non-exempt employee of Defendant and was subject to the same pay
27 structure and rules as all the other hourly non-exempt employees of Defendant.

4 17. I do not believe that I have any conflicts with class members included in this proposed
5 settlement. I do not have any intention to take any action that would place me in a position that is
6 hostile to other class members. I do not have any business or personal relationships with any of my
7 attorneys other than me retaining them to represent me in this lawsuit.

8 SERVICE AS A CLASS REPRESENTATIVE

9 18. I have assumed some long-lasting risk in prosecuting this case. Because it is so easy
10 to search for information online these days, I will face an increased risk that future employers will
11 discover information about this lawsuit online and have a negative reaction to learning that I sued an
12 employer. This may make it harder for me to obtain future employment or change jobs for a better one.

13 19. I have devoted a substantial amount of my time, both before this lawsuit was filed
14 and during its litigation to ensure a fair result for the class. This involved ongoing communications and
15 participation with my counsel during the course of this case.

16 18. My participation began with bringing certain issues that are involved in this matter to
17 my counsel's attention and explaining the factual background that was used to prosecute the claims in
18 this case.

19 19. For example, I reviewed documents which I already had, I provided relevant documents
20 to my counsel, and I explained those documents and related facts to my counsel to assist them in their
21 review.

22 20. I also talked for many hours with my attorneys before the mediation in this case. I
23 made sure I was available during mediation. Based on the approximately 25 hours I have spent on this
24 case I believe that \$7,500 is a reasonable enhancement award.

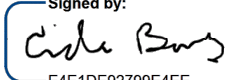
25 21. After the mediation, a long-form settlement agreement was negotiated, and I reviewed it
26 with my attorneys as well as I was able to ensure that its terms are likewise fair and adequate.

27 22. Based on the approximately 25 hours I have spent on this case I believe that \$7,500 is a

reasonable enhancement.

23. I believe I have fairly represented the absent Class and request that the Court approve this settlement and confirm me as Class Representative. I have always maintained the best interest of the Class while performing my class representative duties. I am not aware of any conflicts of interest that would prevent me from being confirmed as the Class Representative in this lawsuit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my personal knowledge. This declaration is executed on 10/16/2024, at Long Beach, California.

Signed by:

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 CIDA BENG