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Attorneys for Plaintiff and the Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

LEYLA SHAMS, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

REVATURE LLC, a Virginia corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: 22CV394270

**DECLARATION OF LEYLA SHAMS IN
SUPPORT OF PLAINTIFF’S MOTION TO
APPROVE SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE ATTORNEYS
GENERAL ACT**

Date: June 4, 2025

Time: 1:30 p.m.

Dept.: 19

Action Filed: February 14, 2022

Trial Date: None Set

DECLARATION OF LEYLA SHAMS

I, Leyla Shams, hereby declare and state as follows:

1. I am an individual over the age of 18. I am the named plaintiff in the above-reference action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I was employed by Defendant Revature LLC (“Defendant”) as an Associate from about July 2021, to about November 2, 2021. I worked as a non-exempt, hourly employee.

3. During my employment, I was required to undergo Defendant’s training program. I was also required to pay Defendants for the cost of the training program when my employment ended.

4. Since the training was performed remotely, I was required to use my own computer and internet access for the training. I was not reimbursed for the costs incurred in using my own computer and internet. I was also not reimbursed for the costs of using my personal cell phone to communicate with Defendant and its employees for work purposes.

5. Additionally, Defendant had a practice of paying my wages more than seven days after the end of the payroll period.

6. I filed this lawsuit because I was concerned that employees should not be required to pay for training. By bringing a representative action lawsuit, I hoped that I might be able to change Defendant’s policies to better protect the working conditions of other workers.

7. I did not make the decision to file a representative action lightly. Although the lawsuit is justified, it was a hard decision to decide to move forward with a lawsuit because of the impact it had on my life.

8. I respectfully request that the Court award a \$10,000 service payment. I have done my best to represent the interests of the employees that are part of this settlement. I have actively contributed to this case by regularly communicating with my attorneys and their staff, reviewing and signing the PAGA Notice, reviewing the Complaint, providing my attorneys with information and documents, and reviewing and signing the settlement agreement.

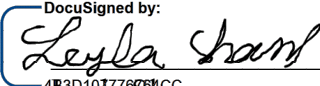
9. I am proud of the result and accomplishment of this lawsuit. I feel that it is a

1 positive accomplishment and understand that other people will benefit because of the actions that
2 I have taken.

3 10. I do not believe I have any interests that are adverse to the other employees that
4 are part of the PAGA settlement. I do not have any conflicts of interest with the Just Gap Fund,
5 which is the designated cy pres recipient for uncashed checks.

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

8 Executed on May 12, 2025, at San Francisco, California.

9 DocuSigned by:
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