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

RAHMAD PERRY; individually, and on
behalf of other members of the general
public similarly situated;

Plaintiff,

vs.

BELLA BRU NATOMAS, LLC, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 34-2020-00281583-CU-OE-GDS

Honorable Jill H. Talley
Department 25

CLASS ACTION

**DECLARATION OF RAHMAD PERRY
IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT,
ATTORNEYS' FEES, COSTS, AND
ENHANCEMENT PAYMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Enhancement
Payment; Declaration of Class Counsel
(Edwin Aiwazian); Declaration of Settlement
Administrator (Lindsay Kline); and
[Proposed] Final Approval Order and
Judgment filed concurrently herewith]

Date: January 20, 2023
Time: 9:00 a.m.
Department: 25

Complaint Filed: July 8, 2020
FAC Filed: February 14, 2022
Trial Date: None Set

DECLARATION OF RAHMAD PERRY

I, **Rahmad Perry**, 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, and 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 Defendant Bella Bru Natomas, LLC (“Bell Bru”) in an hourly-paid, non-exempt position from approximately June 2018 to approximately January 2019. I decided to seek legal advice about my work experiences at Bella Bru and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Bella Bru paid me and other employees what was owed to us 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 5 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 6 hours discussing my situation, wage-and-hour class actions in general and representative actions under the Private Attorneys General Act (“PAGA”), and what it meant to be a named plaintiff, class representative, and eventually, a PAGA representative.

3. I have spent over 18 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which has included providing documents concerning my employment with Bella Bru, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Bella Bru. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and to provide them with any additional information that I had obtained.

4. As the case progressed, 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 as I could.

I spent at least 12 additional hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Bella Bru.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about 3 hours reviewing the settlement paperwork and an additional 1.5 hours asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

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

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

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

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

Executed this ^{05/04/2022} ____ day of May 2022, at Sacramento, California.

Electronically Signed 2022-05-05 01:07:20 UTC - 12.0.142.94
Rahmad Perry
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Rahmad Perry