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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SACRAMENTO

TERESA ALEXANDER, on behalf of herself and
all "aggrieved employees" pursuant to Labor Code
§ 2698 *et seq.*,

Plaintiffs,

v.

CAREER SYSTEMS DEVELOPMENT
CORPORATION, a Delaware Corporation and
DOES 1 through 10, inclusive,

Defendants.

Case No. 34-2020-00278027

*Assigned to the Hon. Richard K. Sueyoshi, Dept.
53*

**DECLARATION OF CENTRIAL
WILLIAMS IN SUPPORT OF MOTION
FOR AN ORDER APPROVING
SETTLEMENT OF CLAIMS BROUGHT
PURSUANT TO THE PRIVATE
ATTORNEYS GENERAL ACT OF 2004**

Date: September 28, 2022
Time: 1:30 p.m.
Dept.: 53

Reservation No.: 2661792

Complaint Filed: May 6, 2020

DECLARATION OF CENTRIAL WILLIAMS

I, Centrial Williams, declare as follows:

1. I am an individual over the age of 18. I am one of the Plaintiffs in the above-referenced 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 Career Systems Development Corporation (the "Company") as a Social Development Director from about September 2018, until about July 2021. I worked as an hourly, non-exempt employee.

3. During my employment, the wage statements that I received from the Company did not identify the pay period start date.

4. 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. This includes but is not limited to: (1) participating in numerous telephonic and in-person meetings with my attorneys and their staff; (2) providing my attorneys with information and documents; (3) preparing for and making myself available for mediation; and (4) reviewing and executing the settlement agreement.

5. I do not believe I have any interests that are adverse to the other employees that are part of the settlement.

6. I am aware and have been aware from the inception of the case, that there was a risk if I do not win my case. I understand that I could have been liable for the Company's legal costs had the Company prevailed. I understood that filing this lawsuit is a public record, and that it could and can adversely affect my ability to obtain employment. Even understanding all these risks, I was willing to move forward and bring this case on behalf of the other employees.

7. I also executed a general waiver of any and all claims, known and unknown, including a waiver of California Civil Code § 1542, which I understand was not required of other employees.

8. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive accomplishment and understand that other people will benefit because of the actions that I have taken.

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

3 Executed on this ²⁵ day of July 2022, at Sacramento, California.

4 DocuSigned by:

5 

6 Central Williams