

JAMES HAWKINS APLC
JAMES R. HAWKINS SBN 192925
GREGORY MAURO, SBN 222239
MICHAEL CALVO, SBN 314986
9880 Research Drive, Suite 200
Irvine, California 92618
Telephone: (949) 387-7200
Facsimile: (949) 387-6676
James@jameshawkinsaplc.com
Greg@jameshawkinsaplc.com
Michael@jameshawkinsaplc.com

Attorneys for ELIZABETH ANN O'REILLY, on behalf of
the general public as private attorney general

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

ELIZABETH ANN O'REILLY, and on behalf
of all others similarly situated,

Plaintiffs,

v.

REEL SECURITY CALIFORNIA, INC., a
California Corporation; and DOES 1-10,
inclusive,

Defendants.
.

Case No.: 22STCV06095
Assigned for all purposes to the
Honorable Monica Bachner, Dept. 71

**DECLARATION OF ELIZABETH ANN
O'REILLY IN SUPPORT OF
STIPULATION AND ORDER
APPROVING SETTLEMENT OF
PRIVATE ATTORNEYS GENERAL ACT
CLAIMS, AND ENTERING JUDGMENT
THEREON**

DECLARATION OF ELIZABETH ANN O'REILLY

I, Elizabeth Ann O'Reilly, declare as follows:

1. I am over the age of eighteen. The following is based upon my personal knowledge, and if called as a witness, I could and would competently testify regarding the statements in this Declaration.

2. I was employed by Defendant Reel Security California, Inc. ("Defendant"), as a non-exempt employee in approximately November 2020 with the title of Security Guard. My duties included but were not limited to foot patrol and security services at production site locations.

3. Prior to filing this lawsuit, I searched for an attorney and found James Hawkins, APLC. I never knew James Hawkins, APLC before my consultation with them. After my consultation, I asked them to represent me in bringing a PAGA action on behalf of myself and all other similarly situated non-exempt employees of Defendant.

4. I knew the alleged Labor Code violations complained of in the complaint not only happened to me but happened to the other employees of Defendant that I worked with. I wanted to help the other non-exempt workers vindicate their rights, so I decided to bring this action lawsuit that we filed on or about February 16, 2022.

5. I believe my situation is similar and has been similar to all other non-exempt employees like me who worked for Defendant during the PAGA period. The Complaint which I brought against Defendant, alleged PAGA Representative claims for: (a) failure to pay wages including overtime; (b) failure to provide meal periods for every work period exceeding more than five (5) or ten (10) hours per day and failure to pay an additional hour's of pay or accurately pay an additional hour's of pay in lieu of providing a meal period; (c) failure to provide rest breaks for every four hours or major fraction thereof worked and failure to pay an additional hour's of pay or accurately pay an additional hour's of pay in lieu of providing a rest period; (d) failing to pay all wages earned and owed upon separation from Defendant's employ; (e) failing to provide accurate itemized wage statements; (f) failing to provide suitable seating; and (g) failing to reimburse expenses.

1 6. I believe that my interests have been and continue to be in alignment with the
2 Aggrieved Employees, and I am willing to continue to pursue and prosecute their representative
3 claims against Defendant in this litigation. I believe I do not have any interests which are against
4 the interests of the Aggrieved Employees, and I will continue to do what is best for all the
5 Aggrieved Employees rather than myself, as I have done from the beginning of this case.

6 7. My relationship with James Hawkins, APLC is purely an attorney client
7 relationship and there are no other business, familial or social relationships between my attorney
8 and myself. In addition, I do not have any relationship with Defendants other than being a former
9 employee of Defendants. For these reasons, there is no conflict of interest between myself, my
10 attorney, between Defendant, and myself or between the Aggrieved Employees and myself.

11 8. As the PAGA Representatives in this case, I participated in every aspect of the
12 litigation and have been apprised of its progress. I believe I have maintained the best interests of
13 the Aggrieved Employees while performing my PAGA Representative duties. I have participated
14 in many interviews and conferences with my counsel regarding the conduct and settlement of this
15 matter.

16 9. My counsel has informed me that this information, along with the details and
17 support I provided for the claims alleged in this matter, were very important in convincing
18 Defendants to negotiate the settlement now before the Court for approval. I have also provided
19 many documents to my counsel in support of the PAGA claims, have helped my attorneys with
20 preparing written questions and what documents to ask for, and I have invested a lot of time and
21 effort in performing my duties on behalf of the Aggrieved Employees. I also conducted numerous
22 meetings with my counsel to prepare for and discuss Defendant's information requests relating to
23 formal discovery.

24 10. After reviewing the Settlement Agreement and speaking with my counsel about it,
25 I agreed to sign it on behalf of myself and all the other Aggrieved Employees. I signed the
26 Settlement because I believe the Settlement obtained in this case on behalf of the Aggrieved
27 Employees is very fair, sufficient, and reasonable in view of the facts I know and have been made
28 aware of, and due to the risk of going through further litigation. I believe the average payouts for

the Aggrieved Employees are very reasonable considering all the facts and evidence and risks moving the case forward to trial.

11. I have not received and understand I will not receive any consideration or promises that are different from any of the other Aggrieved Employees will receive under the Settlement.

12. I also understand and believe to be fair the settlement allocation formula and believe it fairly accounts for the individual settlement payments based on the strengths and weaknesses of the various alleged claims and also considering the individual compensation and pay rates for the various class members over the settlement period.

13. I also understand my counsel will request that I be awarded an Incentive Payment of \$10,000.00 for my efforts as a PAGA Representative, and that this additional payment is not guaranteed, but must be approved by the Court. I believe the requested enhancement payment is fair and reasonable based upon the results we have achieved for the Aggrieved Employees and because of the tasks I have performed on their behalf, including:

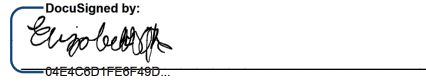
- Compilation of many documents for my attorneys;
- Review of many documents with my attorneys;
- Conducting preparation with my attorneys and participating in responding to information to formal and informal discovery requests;
- Several telephone conferences with my attorneys and their representatives; and
- Participation in the approval settlement process;

14. I estimate that I have spent approximately 30 hours helping to prosecute this matter.

15. I also believe the requested enhancement payment is fair and reasonable because my decision to accept the risk of being a PAGA Representative in a PAGA action under the Labor Code may affect my future ability to get other jobs in this industry. I also understood and accepted the risk of potentially being liable for the opposing parties' costs and attorneys' fees if I was unsuccessful in this lawsuit. I voluntarily assumed these real and large risks and the case would not have been brought without me and the other class members. I believe the Aggrieved

1 Employees will receive a good benefit by resolving their claims against Defendants under the
2 terms of the settlement.

3 16. I declare under penalty of perjury under the laws of California that the foregoing is
4 true and correct. Executed on this 05 day of February 2025 at Los Angeles, California.

5
6 04E4C8D1FE6F49D...

7 ELIZABETH ANN O'REILLY
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28