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(Additional counsel listed on next page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ALAMEDA

SHARONDA TAYLOR, TATIANNA
SMITH, and ZENOBI MILLIGAN,
individually and on behalf of all others
similarly situated,

Representative Plaintiffs,

vs.

TESLA, INC. doing business in California as
TESLA MOTORS, INC.; and DOES 1
THROUGH 50, INCLUSIVE,

Defendants.

Case No.: 23CV028922

**DECLARATION OF BRYAN J. SCHWARTZ
IN SUPPORT OF SUPPLEMENTAL
BRIEFING OF PLAINTIFFS TAYLOR AND
MILLIGAN ISO PAGA SETTLEMENT
APPROVAL ADDRESSING QUESTIONS RE
TATIANNA SMITH**

Complaint Filed: March 7, 2023

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7 *Attorneys for Representative Plaintiffs Sharonda Taylor*
8 *and Zenobia Milligan*

1 I, Bryan Schwartz, declare as follows:

2 1. I am a member in good standing of the Bar of the State of California and Plaintiffs'
3 counsel of record in this matter. I am over 18 years of age and make this declaration based upon my
4 personal knowledge and could so testify if called to do so. I submit this declaration in support of
5 Plaintiffs Taylor and Milligan's Supplemental Briefing in Support of PAGA Settlement Approval
6 Addressing Questions Re Tatianna Smith.

7 2. My firm, Bryan Schwartz Law, P.C., along with our co-counsel California Civil Rights
8 Law Group and Nichols Kaster, LLP, represent Representative Plaintiffs Sharonda Taylor and Zenobia
9 Milligan (also referred to herein as "Plaintiffs") with respect to their claims on behalf of the California
10 Labor Workforce Development Agency (LWDA) against Tesla relating to personnel file production.

11 3. Plaintiffs' Counsel did not misrepresent the settlement proceedings or the terms of the
12 settlement agreement, either in statements to Tatianna Smith or in the declarations provided in support
13 of Plaintiffs' Motion for Settlement Approval and Motion for Attorneys' Fees and Costs.

14 4. Tatianna Smith was not excluded from the mediation that took place in this case. Ms.
15 Smith attended the mediation (as much of it as she wished to attend) via Zoom. Plaintiffs' Counsel never
16 bars clients from attending mediation as a matter of policy.

17 5. Plaintiffs' Counsel never guarantees clients any kind of recovery amount as a matter of
18 policy, and indeed, expressly disclaims any guarantees or warranties as to the outcome of any case in all
19 of Plaintiffs' Counsel's representation agreements.
20

21
22 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and
23 correct. Executed in Oakland, California, on August 1, 2025.

24
25 */s/ Bryan Schwartz*
26 By: _____
27 Bryan J. Schwartz
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