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Attorneys for Plaintiff JALEEN ROBERTS, in a Representative capacity only, and on behalf of
other members of the general public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

JALEEN ROBERTS, in a Representative
capacity only, and on behalf of other
members of the general public similarly
situated,

Plaintiff,

v.

ENCONTRO NORTH PARK, LLC, a
California Limited Liability Company; and
DOES 1-10, inclusive

Defendants

CASE NO. 37-2022-00030477-CU-OE-CTL

**DECLARATION OF JALEEN ROBERTS
UNOPPOSED MOTION FOR FINAL
APPROVAL OF (1) CLASS ACTION
SETTLEMENT; (2) ATTORNEYS' FEES
AND COSTS; and (3) CLASS
REPRESENTATIVE AWARD**

Date: January 19, 2024

Time: 1:30 p.m.

Judge: Hon. Marcella O. McLaughlin

Dept.: C-72

1 I, JALEEN ROBERTS, declare as follows:

- 2 1. I am the named Plaintiff in the above-captioned matter.
- 3 2. I make this declaration in support of Plaintiff's Unopposed Motion for Final Approval of (1)
- 4 Class Action Settlement; (2) Attorneys' Fees and Costs; and (3) Class Representative Award.
- 5 I am personally familiar with the facts set forth in this declaration, and if called to testify could
- 6 and would do so.
- 7 3. I personally met with my Attorneys on several occasions.
- 8 4. During these meetings, I would review and explain documents turned over by Defendant from
- 9 my employment. I believe I reviewed more than 200 pages of documents during meetings with
- 10 my attorneys. I would also explain my (as well as others') role during work. I also helped
- 11 identify numerous other employees who could support the claims I was making in this lawsuit.
- 12 5. I also spoke with my attorneys on the phone on at least 15 other occasions.
- 13 6. I also spent significant time reviewing the settlement documentation and discussing the
- 14 settlement with my attorneys.
- 15 7. In total, I estimate that I spent at least 35 hours related to the above mentioned tasks directly
- 16 working with my attorneys. I also spent at least another 8-10 hours of my own time gathering
- 17 evidence and outlining issues that I later shared with my attorneys.
- 18 8. When I decided to move forward with this case, I was counseled by my attorneys of the
- 19 potential stigma of being a Class Representative in a publicly filed lawsuit.
- 20 9. I was also advised when I brought this case that had we lost, I could have been personally
- 21 liable for paying all of Defendant's costs. I was further advised this could be into the tens of
- 22 thousands of dollars on this type of case.
- 23 10. Despite these risks I was committed to achieving a settlement that would benefit all employees
- 24 working for Encontro North Park, LLC.

25 I declare under penalty of perjury under the laws of the State of California that the foregoing

26 is true and correct. Executed this 12/19/2023 day of December, 2023, at San Diego, California.

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JALEEN ROBERTS