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10 *Attorneys for Plaintiff*

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12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

14 BRYANT HARRIS; individually, and on
15 behalf of other members of the general public
16 similarly situated, and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act,

17 Plaintiff,

18 vs.

19 TVI, INC. D/B/A SAVERS, VALUE
20 VILLAGE & VILLAGE DES VALEURS, an
21 unknown business entity; SAVERS, INC., an
unknown business entity; and DOES 1 through
22 100, inclusive,

23 Defendants.

Case No.: BC612403

Honorable Carolyn B Kuhl
Department SSC12

**DECLARATION OF BRYANT HARRIS
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Edwin Aiwazian); and [Proposed]
Order filed concurrently herewith]

Date: TBD
Time: TBD
Department: SSC12

Complaint Filed: March 1, 2016
FAC Filed: May 31, 2016
SAC Filed: December 27, 2018
Jury Trial: None Set

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1 4. Throughout my involvement in this case, I was available to answer any questions
2 my attorneys had, and available to speak and meet with my attorneys whenever they needed me.
3 I responded to them as quickly as possible and gave them as much information as I could.
4 I spent at least 7 hours speaking with my attorneys about the case, sending them documents,
5 identifying potential witnesses, and also describing policies, practices, and procedures of Pacific
6 Theatres. During the discovery phase of the litigation, I spent approximately 10 additional hours
7 reviewing discovery requests that had been propounded on me, locating documents, and
8 providing documents and responses to my attorneys.

9 5. On May 1, 2017, I attended a full day of deposition that lasted approximately 6.5
10 hours. I spent at least 3 hours preparing for the deposition and approximately 12 additional hours
11 traveling to and from the deposition. After the deposition, I spent at least 2 hours reviewing my
12 testimony and discussing the contents of the deposition transcript with my attorneys.

13 6. As far as the settlement is concerned, I was available to review documents and
14 answer any questions my attorneys had. I spent about 2 hours reviewing the settlement
15 agreement and about 1 hour asking questions and discussing the potential settlement with my
16 attorneys before signing the settlement agreement.

17 7. I believe that I have done everything that my attorneys have asked of me and have
18 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
19 obtained in this case, and as a class representative, I respectfully request that the Court award me
20 an enhancement payment in the amount of \$7,500.00 for my active participation in this case.
21 Taking into consideration the time that I have dedicated to this case, I believe that this amount is
22 reasonable.

23 8. I am not related to anyone associated with Lawyers *for* Justice, PC or Righetti •
24 Glugoski P.C.

25 9. I have not entered into any undisclosed agreements, nor have I received any
26 undisclosed compensation in this case. The only compensation I will receive is whatever amount
27 the Court awards me as an enhancement payment, as well as my share of the settlement as a class
28 member.

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

3 Executed this 14 day of January 2019, at Hayward, California.

4 Bryant Harris
Bryant Harris (Jan 14, 2019)

5 Bryant Harris