

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Matthew Righetti (SBN 121012)
John Glugoski (SBN 191551)
RIGHETTI • GLUGOSKI P.C.
456 Montgomery Street, Suite 1400
San Francisco, California 94104
Telephone (415) 983-0900
Facsimile (415) 397-9005

Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

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

Plaintiff,

vs.

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

Defendants.

Case No.: BC612403

Honorable Carolyn B Kuhl
Department SSC12

**DECLARATION OF BRYANT HARRIS
IN SUPPORT OF PLAINTIFF'S
MOTION FOR MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEYS' FEES,
COSTS, AND ENHANCEMENT
PAYMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees, Costs, and Enhancement
Payment; Declaration of Class Counsel
(Edwin Aiwazian and Matthew Righetti);
Declaration of Settlement Administrator
(Tina Chiango); and [Proposed] Final
Approval Order and Judgment filed
concurrently herein]

Date: December 10, 2019
Time: 11:00 a.m.
Department: SSC12

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

DECLARATION OF BRYANT HARRIS

I, **Bryant Harris**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendants TVI, Inc. d/b/a Savers, Value Village & Village Des Valeurs, and Savers, Inc. ("Savers") as an exempt, salaried employee from approximately April 2014 to September 2015. I decided to seek legal advice about my work experiences with Savers and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Savers paid me and other employees what was owed to us and stopped its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 3 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 4 hours discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff, class representative, and PAGA representative.

3. I have spent over 10 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with Savers, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance regarding the duties of salaried employees, and helping develop a strategy as to what documents and information to obtain from Savers. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

///

///

///

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
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

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

Bryant Harris
Bryant Harris (Jan 14, 2019)

Bryant Harris