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8 Attorneys for Plaintiff JEANNE BECKMAN,
9 on behalf of herself, all others similarly
10 situated, and on behalf of the general public.

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF SAN BERNARDINO**

13 JEANNE BECKMAN on behalf of herself,
14 all others similarly situated, and on behalf
15 of the general public,

16 Plaintiff,

17 vs.

18 BRASWELL LEISURE MANOR LTD. A
19 CALIFORNIA LIMITED
20 PARTNERSHIP; and DOES 1-100,

21 Defendants.

Case No.: CIVSB2209750

*[Assigned for All Purposes to the
Honorable Jessica Morgan, Dept. S-26]*

**DECLARATOIN OF PLAINTIFF JEANNE
BECKMAN IN SUPPORT OF HER
MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT, CONDITIONAL
CERTIFICATION, APPROVAL OF CLASS
NOTICE, SETTING OF FINAL APPROVAL
HEARING DATE**

Date: July 30, 2024
Time: 8:30 a.m.

Complaint Filed: May 11, 2022
Trial Date: Not Set Yet

1 I, JEANNE BECKMAN, hereby declare under penalty of perjury as follows:

- 2 1. I have personal knowledge of all matters stated herein, and if called as a witness, I could and
3 would competently testify thereto, except as to those matters stated upon information and
4 belief, and as to those matters, I believe them to be true.
- 5 2. I am a named Plaintiff and Class Representative in the above-captioned lawsuit, and I submit
6 this declaration in support of settlement approval.
- 7 3. I worked for Braswell Leisure Manor ("Braswell") as a non-exempt, hourly worker in
8 California from on or about May 10, 2021, to on or about December 25, 2021.
- 9 4. On May 11, 2022, I brought this class action lawsuit. Prior to filing, I understood that, if this
10 case was filed as a class action, I would not only be seeking compensation for myself, but I
11 would also be representing the interests of all other class members who, like myself, were
12 employed by Braswell in California.
- 13 5. I had many meetings and conversations with my attorneys about my experience working for
14 Braswell. Since becoming a class representative, I diligently worked on this case. Throughout
15 this litigation, I regularly conferred with my attorneys to discuss the status of the case, to
16 offer my input, and to assist my attorneys in gathering the evidence necessary to prosecute
17 the claims. I always answered phone calls from my attorneys or called them back promptly
18 when they called. I also promptly responded to emails sent by my attorneys. On many
19 occasions, I spoke with my attorneys for case related purposes. I assisted my attorneys in
20 investigating the case. I also looked for documents from my employment with Braswell and
21 provided my attorneys with all documents I found. I have worked diligently to help progress
22 the case.
- 23 6. I was aware that, at some point in this case, I would have my deposition taken. I knew that
24 the deposition could take a full day and that I may have to meet with my attorneys prior to
25 my deposition. I was at all times ready and willing to sit for my deposition.
- 26 7. Although I did not attend the mediation in person, I was available on the phone for all the
27 negotiations, which I was kept apprised of and assisted in. I gave my consent to settle with
28

Braswell for the gross settlement amount of \$325,000. I completely and carefully reviewed the Memorandum of Understanding and settlement agreement. I then signed them.

8. From the very beginning, I understood that I was participating not only for my own benefit, but for the many past and present employees of Braswell. I understood that there were risks involved in class action lawsuits. I understood that the lawsuit could continue for several years and require my services and attention the entire length of the lawsuit.

9. In light of the work I performed in this case and the duties associated with being a class representative in a case of this magnitude, I believe the \$10,000 class representative enhancement payment is reasonable. I understand that this additional payment is not guaranteed and is subject to Court approval.

10. I have and will continue to adequately represent all of the interests of the class. With my status as class representative, I will treat the interests of the Class above my interests.

11. My claims are typical of the Class Members because I am similarly situated to all current and former non-exempt employees of Defendant within the State of California who worked for Braswell at any time between May 11, 2018, through the date the Court grants preliminary approval. Thus, my interests are the same as all members of the proposed Class.

12. In summary, over the course of this litigation I have spent a significant amount of time conferring and working with my attorneys on the prosecution of my claims and evaluating the settlement and related documents. I have spent numerous hours of my time assisting and providing information to my attorneys in the prosecution of this lawsuit.

13. I recognize that any resolution of this matter must be approved by the Court in terms of whether the settlement is fair and reasonable, and that I am obligated to protect the interests of all of class members for the Class Period.

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

Dated: 7/3/2024

DocuSigned by:
By: Jeanne Beckman
JEANNE BECKMAN