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Attorneys for Plaintiffs, the Proposed Class, and all Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA**FOR THE COUNTY OF LOS ANGELES**

JUANITA VILLA; JESSICA LESHER;
SHERI AMIES, as individuals, on behalf of
the State of California, as a private attorney
general,

PLAINTIFFS,

v.

DOLGEN CALIFORNIA, LLC; and DOES 1
thru 50, inclusive,

DEFENDANTS.

CASE NO. 22STCV34189

[Case Assigned for All Purposes to Hon. Elihu
M. Berle in Dept. 6]

**DECLARATION OF JESSICA LESHER IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS SETTLEMENT**

Date: June 25, 2024

Time: 11:00 AM

Dept.: 6

Complaint Filed:

October 24, 2022

Trial Date:

None Set

DECLARATION OF JESSICA LESHER

I, Jessica Lesher, state and declare as follows:

1. I am a competent adult, over the age of eighteen and a Class Representative Plaintiff in the matter of JUANITA VILLA; JESSICA LESHER; SHERI AMIES, as individuals, on behalf of the State of California, as a private attorney general, v. Dolgen California, LLC; and DOES 1 thru 50, inclusive, Los Angeles County Superior Court, Case No. 22STCV34189. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto. I am making this sworn declaration in support of my claims and the claim of my co-workers, and in support of my qualifications as Class Representative. If called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I worked as an hourly non-exempt employee for Dolgen California, LLC (“Defendant” or “Dolgen”).

3. During my time working for Dolgen, I was required to perform bank deposits in my own vehicle, and was not reimbursed for mileage.

4. I have spent significant time throughout this class action working with Class Counsel. Before filing this action, in October 2022, I researched and identified Counsel that I believed could best represent the interests of the Class Members. I also assisted the attorneys with investigation and gathering of information including discussing my work experience and the experience of others that I had observed while working for Dolgen and provided all relevant employment documents in my possession. In addition, I made myself available for a full-day mediation on February 16, 2023.

5. Throughout the entirety of this litigation, I have maintained regular contact with Class Counsel and assisted in any way possible by providing information and making myself available as needed.

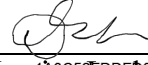
6. I was aware that by helping to initiate this lawsuit, my name would become known and it was possible that my involvement in this matter could make it more difficult for me to obtain employment in this field. Regardless, I believed it was important to proceed with this matter on my behalf and on behalf of all others who were subject to the same problems during their

1 employment with Dolgen.

2 7. Based upon my participation in this case, I understand the merits of this settlement
3 and I strongly support the settlement and believe it is fair and reasonable, and in the best interest
4 of the class. I believe this Settlement will benefit the Class.

5 8. It is my opinion that a fair and adequate Class enhancement for me as a Class
6 Representative is \$5,000.00. I believe that it is fair and reasonable in view of all of the work I have
7 performed in my role as a Class Representative. As Class Representative, I actively participated
8 in all stages of the litigation as detailed above and have always maintained the best interest of the
9 Class while performing my Class Representative duties.

10
11 I declare under penalty of perjury under the laws of the State of California that the
12 foregoing is true and correct. Executed this 17th day of April, 2024
13 at Anza, California.

14 DocuSigned by:
15 
16 Jessica Lesher
17 Declarant
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(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On April 26, 2024, I served all interested parties in this action the following documents described as: **DECLARATION OF JESSICA LESHER IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Mike Arias
mike@aswtlawyers.com
Craig S. Momita
craig@aswtlawyers.com
**ARIAS SANGUINETTI WANG
& TORRIJOS LLP**
6701 Center Drive West, Suite 1400
Los Angeles, CA 90045

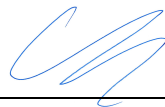
McGUIREWOODS LLP
Sabrina A. Beldner, Esq.
Email: sbeldner@mcguirewoods.com
Sarah Y. Oh, Esq.
Email: soh@mcguirewoods.com
1800 Century Park East, 8th Floor
Los Angeles, CA 90067

[XX] **BY ELECTRONIC SERVICE:** I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] **BY ELECTRONIC MAIL TRANSMISSION:** I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

[XX] **(STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 26, 2024, at Woodland Hills, California.



Michelle Tanzer