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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN

ANGELA SMITH, an individual;
KASSANDRA HERNDON, an individual; on
behalf of themselves and all others similarly
situated and the general public,

Plaintiffs,

vs.

AGREEYA SOLUTIONS, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: STK-CV-UOE-2023-0002783

Honorable Esmeralda Zendejas
Department 11B

**DECLARATION OF PLAINTIFF
KASSANDRA HERNDON IN SUPPORT OF
MOTION FOR APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date:
Time:
Dept.:

Complaint Filed: March 22, 2023
FAC Filed: May 16, 2023
SAC Filed: February 13, 2025
Trial Date: Not Set

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1 much information as I could.

2 6. I understood that in the event this matter did not settle and proceeded with trial, I would
3 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
4 responsibilities that are necessary for this lawsuit.

5 7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
6 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
7 also understood there was a risk of losing any job and/or income due to the time that I would have to
8 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. Most
9 importantly, I believe that by pursuing this case, I have taken a significant risk because future
10 employers can easily find out that I sued my prior employer, and that may negatively impact my ability
11 to find employment within this industry – and even outside of it – in the future. In contrast, the other
12 employees who will be receiving money from this lawsuit did not have to file a claim or take the risk
13 that I took in bringing this action.

14 8. I reviewed the settlement agreement, discussed the settlement agreement with my
15 attorneys, and asked them questions before signing it.

16 9. I believe that I have done everything that my attorneys have asked of me and tried, to
17 the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California.
18 I have spent approximately 45-50 hours participating in this case as described above. I believe my
19 efforts helped get the result obtained in this case.

20 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
21 approval, and any settlement must be designed in the best interest of the Class as a whole. At all times
22 throughout the course of this litigation I have considered the interests of the Class and put them before
23 my own personal interests.

24 11. I understand that incentive or enhancement awards are discretionary and intended to
25 compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and
26 other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA
27 action, and an acknowledgment of the benefits resulting from the representative's actions. I believe
28 my work in this matter is meritorious on these points for the reasons set forth above.

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2 12. I respectfully request that the Court approve and award me a Service Award in the
3 amount of \$7,500.00 for my efforts and active participation in the case and for the broader, general
4 release of all claims that I have or may have against Defendant in connection with the settlement.
5 Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

6 13. I understand that Blackstone Law, APC, Bartz Law Group, APC, and United Employee
7 Law Group, PC will share the attorneys' fees in this matter. I agreed to this in writing. I understand
8 that the amount of attorneys' fees will not increase as a result of this fee sharing.

9 14. I am not related to anyone associated with Blackstone Law, APC Bartz Law Group,
10 APC, and United Employee Law Group, PC.

11 I declare under penalty of perjury under the laws of the State of California that the foregoing
12 is true and correct. Executed on 04/02/2025, at Sacramento, California.

13 *Kassandra Herndon*

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