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Attorneys for Plaintiff ANGELA SMITH and all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF SAN JOAQUIN**

|                                               |                                    |
|-----------------------------------------------|------------------------------------|
| ANGELA SMITH, an individual;                  | ) Case No. STK-CV-UOE-2023-0002783 |
| KASSANDRA HERNDON, an individual; on          |                                    |
| behalf of themselves and all others similarly |                                    |
| situated and the general public,              |                                    |
|                                               | ) Honorable Esmeralda Zendejas     |
|                                               | ) Department 11A                   |

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 11A

**DECLARATION OF CLASS  
REPRESENTATIVE ANGELA SMITH IN  
SUPPORT OF PLAINTIFF'S MOTION  
FOR FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT**

Date: October 1, 2025

Time: 9:00 a.m.

Dept: 11A

- 1 -

I, ANGELA SMITH, declare as follows:

1. I am over the age of eighteen and am a Class Representative Plaintiff in the matter *Smith et al. v. Agreeya Solutions, Inc.* The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto.

2. I submit this declaration in support of Plaintiff's Motion for Final Approval of Class Settlement.

3. I was employed as an administrative assistant for Defendant Agreeya Solutions, Inc. ("Defendant") between March 2021 and May 2022. During my time working for Defendant, I was subjected to the same wage and hour policies and practices that are at issue in this case, including the Defendant's practice of failing to pay employees all wages owed, failing to pay the regular rate for all overtime, failing to provide meal periods, failing to authorize and permit rest periods, failing to provide accurate wage statements, failing to reimburse employees for their reasonable and necessary expenses, and related issues.

4. Since the beginning of this case, I have been closely involved in assisting my attorneys to prosecute this action and have done so diligently and aggressively for the past year and a half. Prior to becoming one of the named class representatives in this case, I spoke at length with my attorneys and relayed to them the alleged illegal wage and hour policies and practices of Defendant. I spent several hours discussing the issues in the case and the possibility of filing a representative action with my attorneys at that time.

5. Prior to filing this case, I worked with my attorneys to interpret documents that had been produced as part of my personnel file, including my wage statements and Defendant's pay and reimbursement policies. My attorneys also called me to discuss issues pertaining to other current and former employees, and I connected my attorneys with other employees who experienced similar wage and hour issues as myself.

6. In 2024, the parties agreed to go to Mediation, and I worked with my attorneys to prepare for the Mediation. I spoke with my attorneys numerous times prior to the Mediation, and

I was on-call during the Mediation on April 19, 2024, and spoke to my attorneys to discuss the terms of the settlement.

7. After the Mediation, I worked with my attorneys to ensure that the settlement was fair to all class members. I reviewed the Settlement Agreement and discussed with my attorneys to resolve any questions I had.

8. I have also continued to keep tabs on the settlement agreement, calling my attorneys from time to time to ensure that the settlement was on track.

9. As detailed above, I actively participated in all stages of litigation and have been continuously apprised of all aspects of this case. I believe that if not for my efforts and persistence in this case, that the class members would have benefitted far less without my involvement. I believe Defendant failed to pay me all of my wages that were due to me, and failed to provide legally compliant pay stubs to the entirety of the class. I received the same uniform pay stubs as every other hourly non-exempt employee, which do not list meal and rest period premiums, and fail to properly pay the regular rate for all overtime worked.

10. The claims I have asserted in this case are typical of other class members, in that I have similar claims as other class members, including failing to pay me all wages owed, failing to provide uninterrupted meal and rest periods, failing to reimburse me for all of my business expenses, and the like. I understand and agree to my fiduciary obligations and responsibilities as a class representative, and I have agreed to act in the best interests of the class in pursuing the claims alleged in this case. I also have no claims that are antagonistic to the class, as my interests are aligned with all other class members to obtain the best possible resolution for the class.

11. I dedicated my time to the pursuit of this case, including consulting with my attorneys regarding the issues raised in the action. I have also assisted my counsel in reviewing, analyzing, and interpreting various internal documents generated by Defendant. Additionally, I have participated in numerous telephone conferences with my counsel to discuss the case. I have also assisted my counsel by corresponding with them on repeated occasions to answer any

1 questions about my employment. I also discussed mediation and post-mediation settlement  
2 strategies with my counsel at various points over the last year. I have been diligent, and I believe  
3 I acted above and beyond that which was expected of me as a Class Representative throughout  
4 all stages of the litigation, up to and including the settlement of this Class Action. I have no  
5 claim that was antagonistic to the class. I accepted the potential risk of being liable for the  
6 opposing parties' costs if we were unsuccessful in this lawsuit.

7 12. In addition to performing work on this matter, I assumed a substantial risk in  
8 serving as a class representative if the Defendant prevailed in this case. My willingness to  
9 assume the financial risk was and is significant. Although I was confident in the merits of this  
10 lawsuit, I do not have any substantial savings and bringing this lawsuit was a serious  
11 commitment on my behalf and exposed myself to considerable risk. My attorneys have advised  
12 me that California law provides that the losing party must pay the prevailing party's costs. As  
13 such, if the Defendant had prevailed in this case, I would have been subjected to a cost award in  
14 the amount of tens of thousands of dollars. Notwithstanding these risks, I chose to serve in my  
15 capacity as Class Representative and pursue all claims against Defendant.

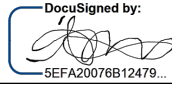
16 13. Considering the amount of time I put into the case, which was no less than 35  
17 hours, the stigma of filing litigation, and the impact it has had on all class members, I believe an  
18 enhancement of \$7,500 is fair and reasonable.

19 14. I understand that Blackstone Law, APC, Bartz Law Group, APC, and United  
20 Employees Law Group, PC will share the attorneys' fees in this matter. I agreed to this in  
21 writing. I understand that the amount of attorneys' fees will not increase as a result of this fee  
22 sharing.

23 15. I am not related to anyone associated with Blackstone Law, APC, Bartz Law  
24 Group, APC, or United Employees Law Group, PC.

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 on September 2, 2025, at LODI, California.

4  DocuSigned by:  
5 5EFA20076B12479...

Angela Smith

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APPROVAL OF CLASS ACTION SETTLEMENT