

James R. Hawkins (SBN 192925)
Christina M. Lucio (SBN 253677)
JAMES HAWKINS APLC
9880 Research Drive, Suite 200
Irvine, California 92618
Telephone: (949) 387-7200
Facsimile: (949) 387-6676
James@Jameshawkinsaplc.com
Christina@Jameshawkinsaplc.com

Attorneys for Plaintiff TESSA TEUSCHER
on behalf of herself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF YOLO

TESSA TEUSCHER, individually and on
behalf of herself and all others similarly
situated,

Plaintiff,

v.

SALLY BEAUTY SUPPLY, LLC, a Virginia
Limited Liability Company; SALLY
BEAUTY HOLDINGS, INC., a Delaware
Corporation, and DOES 1-50, inclusive.

Defendants.

Case No. CV2022-1842

Assigned For All Purposes to:
Hon. Samuel T. McAdam

**DECLARATION OF PLAINTIFF TESSA
TEUSCHER IN SUPPORT OF MOTION
FOR APPROVAL OF PAGA SETTLEMENT
AGREEMENT**

Date: August 7, 2025
Time: 9:00 a.m.
Dept: 14

Complaint Filed: October 25, 2022
Trial: Not Set

DECLARATION OF TESSA TEUSCHER

I, Tessa Teuscher, declare as follows:

1. I am one of the two named plaintiffs in this action. I have personal knowledge of all the facts in this declaration and, if asked, I would testify to these facts under oath in court.

2. I submit this declaration in support of the Motion for Approval of PAGA Settlement Agreement ("Approval Motion").

3. I worked as a non-exempt employee for the Defendants Sally Beauty LLC and Sally Beauty Holdings, Inc. ("Defendants") in Woodland, California, from approximately February 22, 2019, through August 18, 2021. Throughout the entirety of my employment, Defendant paid me on an hourly basis. At all times, I worked as an Inside Sales Representative.

4. I decided to file this lawsuit because I had a number of grievances against Defendants stemming from their labor policies. These grievances are set forth in detail in the operative Complaint and my letter to California Labor and Workforce Development Agency ("LWDA").

5. Prior to filing the action, my attorneys and their staff and I had multiple conferences about the factual bases for the claims that I wanted to pursue against Defendants. Without waiving any privilege, during those conferences, my attorneys provided me with an overview of how those claims would be litigated and generally educated me about the nature of complex/representative litigation and my role as a representative Plaintiff. After meeting with my attorneys about these issues, I decided to proceed with a lawsuit against my former employer.

6. I understand that I filed this lawsuit against my former employer on behalf of the state of California to obtain penalties for Defendant's violations.

7. I have worked to the best of my ability to prosecute this action on behalf of the LWDA, always considering the interests of the LWDA just as I would consider my own interests. I believe these types of actions are an important tool to ensure compliance with the Labor Code and protect the rights of workers.

8. When I agreed to represent the State (LWDA) and the Aggrieved Employees, I understood it was my duty to be readily available and to participate actively in the case. I knew that I needed to keep aware of the status and progress of the lawsuit and assist my attorneys in litigating the case on behalf of

1 the State and the Aggrieved Employees. I knew that I would be required to review documents, search
2 for documents, and produce them to my attorneys, answer written questions, potentially answer oral
3 questions, and testify truthfully under oath, and be available to appear in court, if necessary. At all times,
4 I have worked to fulfill these duties.

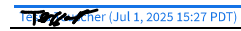
5 9. I am requesting the Court approve \$2,500 as a PAGA Representative Service Payment to
6 myself in connection with the settlement. I believe the amount of the Service Payment is very reasonable
7 considering the financial and professional risks I took by bringing a PAGA lawsuit against my former
8 employer, including the potential of paying court-awarded litigation costs to Defendant and the negative
9 exposure to future employers. I believe this amount is reasonable considering the amount of work and
10 time I spent with my attorneys to achieve this excellent settlement. I spent numerous hours working with
11 my attorneys on this case including assisting with the responses to Defendant's extensive discovery
12 requests, having my deposition taken, and making myself available for a full day mediation to answer
13 questions. The time and service I provided to the Aggrieved Employees resulted in the parties agreeing
14 to settle the case and a positive outcome for all of the Aggrieved Employees, and as a result each
15 Aggrieved Employee will receive a proportional share of the settlement funds in this case.

16 10. In connection with the litigation of the case that I brought, I estimate that I have spent over
17 more than 90 hours assisting my attorneys and their staff and advancing the interests of the Aggrieved
18 Employees. I have spent hours on telephone calls discussing the facts of my case with the attorneys and
19 staff of James Hawkins APLC. Without waiving any attorney-client privilege, I dedicated an extensive
20 amount of time discussing the facts related to my employment with Defendant, including discussing my
21 job duties and responsibilities, and the hours and days I worked. I also spent hours looking through files
22 for all documents related to my employment with Defendant and sending them to my attorneys, which
23 included wage statements and separation paperwork. I spent several hours on telephone calls discussing
24 the documents I provided to my attorneys. I dedicated significant time reviewing documents, including
25 the LWDA letter and complaint, prior to the filing of this lawsuit. I also spent a number of hours
26 reviewing documents and speaking with my attorneys to prepare for my deposition and to having my
27 deposition taken by Defendants. I also spent a number of hours assisting my attorneys with preparing for
28 mediation and participating in mediation to answer questions, as necessary. Throughout this lawsuit I

1 ensured that I was in constant communication with my attorneys regarding the status of this case and the
2 approval process.

3 11. As I have been since initiating this lawsuit in August of 2022, I am committed to this case
4 and intend to continue to participate as needed until the conclusion of this matter for the benefit of the
5 Aggrieved Employees.

6
7 I declare under penalty of perjury under the laws of the State of California that the foregoing is
8 true and correct. Executed on Jul 1, 2025 in Woodland, California.

9
10
11 
12 TESSA TEUSCHER