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Attorneys for Plaintiff LAVONTRA BREAUX, in a Representative capacity only, and on behalf of other members of the public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

LAVONTRA BREAUX, in a Representative capacity only, and on behalf of other members of the public similarly situated

Plaintiff,

v.

L'OCCITANE, INC., a California Corporation; and DOES 1-10, inclusive

Defendant

CASE NO. 30-2023-01311136-CU-OE-CXC

DECLARATION OF LAVONTRA BREAUX IN SUPPORT OF PLAINTIFF'S UNOPPOSED APPLICATION RE: PAGA SETTLEMENT APPROVAL

Date: April 3, 2025

Time: 2:00 p.m.

Dept.: CX-104

Judge: Hon. Melissa R. McCormick

1 I, Lavontra Breaux, declare as follows:

- 2 1. I am the named Plaintiff in the above-captioned matter. I make this declaration on the basis of
3 personal knowledge, except as to those matters stated on information and belief. If called as
4 a witness, I could and would readily and competently testify to all matters stated in this
5 Declaration. I make this declaration in support of Plaintiff's Motion for Approval of PAGA
6 Settlement.
- 7 2. I worked for Defendant L'OCCITANE, INC. from August 23, 2021, through November 27,
8 2022 as a store manager.
- 9 3. During the over two years that this case has been pending, I had numerous conversations with
10 my attorneys, which included detailed explanations about my working conditions, my work
11 history, my job duties and responsibilities, the identification of other potential witnesses,
12 searching my records for helpful documents and text messages, as well as a review of company
13 records. I also worked with my attorney to assist in the preparation of a mediation brief and I
14 participated in the mediation. I reviewed the settlement agreement, the amendments to the
15 settlement agreement, and helped prepare this declaration. I did not keep records, but I estimate
16 that I spent at least 30 hours helping my attorneys prepare for this case.
- 17 4. I understood the risks I would be taking by pursuing this as a PAGA representative, including
18 the potential impact on future employment and risks if Defendant prevailed. I understood that
19 I had a duty to represent the other employees best interests in this matter, and that in order to
20 do so, I would be required to take a substantial amount of time to participate in this lawsuit and
21 to prepare this case.
- 22 5. I actively participated in the prosecution of this case. As mentioned above, I conferred with my
23 attorneys to provide documents, phone records, information, and potential witnesses. I helped
24 prepare for mediation and continued to provide additional information and documents in the
25 weeks leading up to mediation. I also answered questions that came up from the mediator
26 during the course of mediation.
- 27 6. I believe that I should receive an enhancement award. I also believe that without my efforts and
28 participation, this lawsuit would not have been brought on behalf of the non-exempt employees

of Defendant.

7. I believe that the requested \$5,000.00 Representative Enhancement Award for serving as the named plaintiff and PAGA representative is reasonable given the significant time and effort I spent on behalf of the class and the risks I faced in serving as a named class representative. Because of my efforts, approximately 325 employees are able to participate in this settlement and recover a penalty payment for their unpaid wages as well as other workplace violations such as missed meal and rest breaks.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 20th day of March, 2025 at Santa Ana, California.

DocuSigned by:

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Lavontra Breaux