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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA

DANELL PAGE, individually, and on behalf of
all others similarly situated,

Plaintiff,

vs.

CONDUENT STATE & LOCAL SOLUTIONS,
INC., a New York corporation; RANDSTAD
US, LLC, a limited liability company; and DOES
1 through 10, inclusive,

Defendants.

Case No.: 23CV037588

**DECLARATION OF DANELL PAGE IN
SUPPORT OF PLAINTIFF'S MOTION FOR
AN ORDER APPROVING SETTLEMENT
OF CLAIMS BROUGHT PURSUANT TO
THE PRIVATE ATTORNEY GENERAL'S
ACT OF 2004**

Date: December 12, 2024
Time: 2:30 p.m.
Courtroom: 15
Judge: Hon. Peter Borkon

Reservation ID: 201764399314

Action Filed: July 6, 2023
Trial Date: Not Set

DECLARATION OF DANELL PAGE

I, DANELL PAGE, declare as follows:

1. I am an individual over the age of 18 and am the named plaintiff in this matter against CONDUENT STATE & LOCAL SOLUTIONS, INC. ("Defendant"). This declaration is submitted in support of approval of the Settlement reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Defendant as a call center representative from approximately December 2021 to June 2022, and I was subject to Defendant's wage and hour policies at issue in this action.

3. While working for Defendant, at times I did not receive a full 30 minutes for my lunch breaks due to long call times, and the amount of work I had to complete. At times, I was also unable to take my rest breaks due to the same reasons as above. Additionally, I was not reimbursed for purchasing materials that were required for my job, and for using my own home internet and data usage. Furthermore, there were occasions when I worked off-the-clock and was not paid all wages owed for this time. Based on the above violations, it is my understanding that I was not paid all wages at the termination of my employment with Defendant, and that I was issued inaccurate wage statements. I understand that the Defendant strongly disagrees with my claims.

4. I have been actively involved in this case since I first retained Moon Law Group, PC ("MLG") in 2023. I have had many discussions with the attorneys and staff at MLG regarding Defendant's wage and hour policies, my claims in this case, litigation strategy, potential witnesses, updates on how the case was proceeding, and how I could help the case. For example, I remained in regular communication with my attorneys regarding mediation discovery and settlement discussions that the parties had during the course of litigation and mediation. I also provided information and documents to my attorneys to assist them in preparing the case. I also spent time reviewing and discussing the Settlement Agreement as well as other documents from my attorneys, and reviewing my own records for documents that would be potentially relevant to the case. In total, I estimate that I have spent more than 40 hours of my time in connection with this case since I first retained MLG.

5. When I filed this lawsuit, I understood that this lawsuit could benefit my former co-

workers, other employees of Defendants, and the State of California by helping to recover civil penalties on their behalf as a result of the alleged violations described above. I also understood that I was filing this case as an “aggrieved employee” on behalf of myself and my fellow “aggrieved employees” as well as the State of California.

6. When I filed this lawsuit, I knew there was a risk I could be liable for Defendant’s costs if we lost the case. I also understood that filing a lawsuit is public record. However, I accepted those risks so that I could help recover penalties on behalf of other employees and the State of California.

7. As part of the proposed Settlement, and in exchange for my requested enhancement award, I have also agreed to a full release of claims related to my employment with Defendants that extends beyond the release of claims applicable to other aggrieved employees.

8. I understand that my attorneys will request that the Court approve a payment of \$7,500 for my full, general release of all claims against Defendant and as an enhancement award of for my efforts on behalf of aggrieved employees and the State of California. I believe this amount is reasonable based on the general release I am providing, the amount of time and effort I have devoted to this case, the amount of time that has passed since my lawsuit was first filed, as well as the risks I have undertaken as a named plaintiff, as described above.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on 11/12/2024, at Union City, California.

DocuSigned by:

Danell Page

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DANELL PAGE

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the State of California, County of Los Angeles. I am over the age of 18 and not a party to the within suit; my business address is 725 S. Figueroa St., 31st Floor, Los Angeles, CA 90017.

On the date indicated below, I served the document described as: **DECLARATION OF DANELL PAGE IN SUPPORT OF PLAINTIFF'S MOTION FOR AN ORDER APPROVING SETTLEMENT OF CLAIMS BROUGHT PURSUANT TO THE PRIVATE ATTORNEY GENERAL'S ACT OF 2004** on the interested parties in this action by sending ☐ the original [or] ☒ a true copy thereof ☒ to interested parties as follows [or] ☐ as stated on the attached service list:

Heather Hearne
Baton Rouge
Nicole Seale Adler
Cathy O. Edmonds
Linda Markey
Grace Frantz
THE KULLMAN FIRM, PLC
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Attorney for Defendant CONDUENT STATE & LOCAL SOLUTIONS, INC.

☒ **BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known e-mail address or e-mail of record in this action.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct. Executed this **November 18, 2024** at Los Angeles, California.

H. Scott Leviant
Type or Print Name


Signature