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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **IN AND FOR THE COUNTY OF SANTA CLARA**

11 DAIJA WALKER, on behalf of the State of
12 California, as a private attorney general,

13 Plaintiff,

14 vs.

15 CROSSROADS TRADING CO., INC., a
16 Corporation; and DOES 1 through 50, inclusive,

17 Defendants.
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Case No. 23CV416909

**DECLARATION OF PLAINTIFF ADAM
JOY IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date Filed: June 6, 2023

DECLARATION OF ADAM JOY

I, Adam Joy, hereby declare as follows:

1. I am an individual over the age of eighteen (18). I have personal knowledge of the facts stated in this declaration and could and would testify to those facts if called upon to do so. I am also one of the named plaintiffs in the above-caption case. I am submitting this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement.

2. I worked for Defendant from approximately from approximately September 2022 to October 2023 as a cashier at the Crossroads Trading store located in West Hollywood, California.

3. Around October or November 2023, I decided to meet with an attorney to address the harsh conditions I faced working for Defendant. I knew the issues I faced on a regular basis as a cashier were a problem experienced by others who worked for Defendant. So, after learning about the duties and procedures involved with representing the interests of a class of other workers like me, I decided I wanted to serve as a class representative.

4. I knew being a class representative was a serious and time-consuming commitment, but I felt a sense of duty to work on behalf of my coworkers who had faced the same difficulties working for Defendant as I did. Even though I understood Defendant could seek to recover their costs of this lawsuit if they won the case against me, I still decided to go forward as a class representative because I felt it was important to stand up for my coworkers who were too afraid to come forward on their own. Moreover, I was made aware I would likely have to agree to a broader release compared to other Class Members if I chose to serve as a class representative.

5. Being a class representative was a big commitment. It required taking personal time out of my schedule to assist my attorneys and give them important information about Defendant and my employment. This included providing information about Defendant's corporate policies and practices. I also had many phone calls and email exchanges with my attorneys. Furthermore, I gave my attorneys lengthy interviews about my experiences to help them prepare the legal documents. As the case progressed, I searched for and turned over papers related to my job with Defendant. In addition, I have read many case documents, including the letter we submitted to the California Labor Workforce Development Agency, the operative complaint we submitted to this Court, documents

1 produced by Defendant, the mediation brief my attorneys prepared, and the Settlement Agreement.

2 6. I have also taken seriously my responsibility as one of the class representatives to stay
3 informed of what was happening in the lawsuit. Throughout the case, I had many conversations with
4 my attorneys about the documents, evidence, and legal strategy. Some of these conversations have
5 been very long, sometimes involving more than one conversation or email back and forth in a day.

6 7. I was heartened to learn Defendant were interested in mediation to discuss settlement.
7 In advance of the mediation, I spent a lot of time working with my attorneys to provide information
8 and even more time searching for, organizing, and producing documents related to my work for
9 Defendant. I also reviewed hundreds of pages of records Defendant produced regarding my work for
10 them. Our damages calculation for mediation was based on my input on these records and on
11 additional documents and data Defendant provided to my attorneys in response to our mediation
12 requests. In preparation for our mediation, I had a series of phone conversations and email exchanges
13 with my attorneys to go over my understanding of these documents and data as well.

14 8. On February 27, 2024, we had a mediation in this case. I made sure I was available
15 during the mediation for any questions that might come up. The mediation lasted the entire day and
16 at the end of it we agreed to the basic terms of the settlement.

17 9. After the mediation, I participated in several conversations with my attorneys
18 regarding the drafting of the Settlement Agreement. As part of the Settlement Agreement, I am
19 releasing any and all claims I have against Defendant, not just those relating to this case. This broader
20 release also included voluntarily waiving the rights described in Civil Code section 1542. I understand
21 this release is broader than that which applies to the other Class Members.

22 10. In becoming one of the class representatives, I faced the risk that initiating the case
23 could potentially hurt my future employment possibilities with another employer because I would be
24 looked at as a troublemaker and litigious. As I mentioned above, I also faced the risk Defendant might
25 go after me for litigation costs if they won the case against me. This was in addition to having to agree
26 to a broader release compared to other Class Members, as stated above. Furthermore, I have not
27 received any benefits in performing my services as one of the class representatives. Despite these
28 risks and sacrifices, I decided representing the Class was the right thing to do and that it was important

1 Defendant follow the law in how they treat and pay their workers.

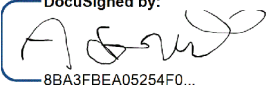
2 11. Considering the time that I have put into this case since the original meetings and
3 conversations in October or November 2023 through the present, including my continued
4 commitment to the case and the risks that came with being one of the named plaintiffs, I respectfully
5 request the Court grant a Class Representative Enhancement Payment of up to \$10,000, in an amount
6 the Court deems to be fair and appropriate. I believe a significant award is warranted because of the
7 result achieved, the many hours of my personal time I have invested in the case, my commitment to
8 seeing it through to a strong settlement for my co-workers, and my release of all other claims I may
9 have against Defendant. Collectively, I believe I spent hours on this case gathering documents,
10 meeting with my attorneys, speaking with my attorney during the case, and being available to answer
11 questions, including at the mediation.

12 12. I have fairly represented the absent Class and herein request the Court approve this
13 settlement and confirm me as one of the class representatives. I have always maintained the best
14 interest of the Class while performing my class representative duties.

15 13. I am not aware of any conflicts of interest that prevent me from being confirmed as
16 one of the class representatives in this lawsuit. Moreover, I am also not related to anyone associated
17 with Bradley/Grombacher, LLP nor have I entered any undisclosed agreements or received any
18 undisclosed compensation in this case.

19 14. I am both proud and grateful my work and participation in the case helped to pave the
20 way for the successful settlement. I believe the settlement offers a very beneficial result for the other
21 workers. I request the Court grant final approval to the class action settlement.

22 I declare under penalty of perjury under the laws of California the foregoing is true and correct
23 and based on my personal knowledge. This declaration is executed on 6/26/2024, 2024 at
24 Los Angeles, California.

DocuSigned by:

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Adam Joy