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Attorneys for Plaintiff CAMILLE LAMPKINS, individually, and on behalf of other members of the public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

CAMILLE LAMPKINS, individually, and on
behalf of other members of the public
similarly situated,

Plaintiff

v.

BELMONT VILLAGE, L.P., a California
Limited Partnership and DOES 1-10,
inclusive

Defendants

CASE NO. 23CV415220

**DECLARATION OF CAMILLE
LAMPKINS IN SUPPORT OF
PLAINTIFF'S UNOPPOSED MOTION FOR
PAGA APPROVAL**

Date: March 19, 2025

Time: 1:30 p.m.

Dept.: 19

Judge: Hon. Theodore C. Zayner

I, CAMILLE LAMPKINS, hereby declare as follows:

1. I am the named Plaintiff in the above-captioned matter. I make this declaration in support of Plaintiffs' Unopposed Motion for PAGA Approval, Attorneys Fees and Costs, and Plaintiff's Enhancement Award.
2. I am personally familiar with the facts set forth in this declaration, and if called to testify as a witness I could and would do so.
3. To my recollection, I personally met with my Attorneys on at least 3 occasions. Several of those meetings lasted in excess of 2 hours.
4. During these meetings, I would review and explain numerous documents turned over by Defendants from my employment. I would also explain my (as well as others') role during work. I also helped identify numerous other employees who could support the claims I was making in this lawsuit. I contacted many of these individuals myself to verify their willingness to participate.
5. I also spoke with my attorneys on the phone on at least 17 other occasions.
6. In total, I estimate that I spent at least 41 hours related to the above mentioned tasks directly working with my attorneys. I also spent at least another 7-8 hours of my own time gathering evidence and outlining issues that I later shared with my attorneys.
7. When I decided to move forward with this case, I was counseled by my attorneys of the potential stigma of being a Representative in a "Wage and Hour," dispute, as this is a publicly filed lawsuit.
8. I was also advised when I brought this case that had we lost, I could have been personally liable for paying all of Defendants' costs. I was further advised this could be well into the tens of thousands of dollars on this type of case.

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9. Despite these risks I was committed to achieving a settlement that would benefit all employees working for Belmont Village.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 26th day, September 2024.

Signed by:

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CAMILLE LAMPKINS