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Attorneys for Plaintiff SHAREEKA NORRIS, on behalf of herself and other aggrieved employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

SHAREEKA NORRIS, an individual; on
behalf of herself and other aggrieved
employees,

Plaintiffs,

vs.

CG HOSPITALITY GROUP, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 23STCV12946

[Assigned For All Purposes To: Hon. Alison
Mackenzie, Dept. 55]

RESERVATION ID. 182133148224

**DECLARATION OF SHAREEKA
NORRIS IN SUPPORT OF MOTION TO
APPROVE PAGA SETTLEMENT**

Date: January 14, 2025
Time: 8:30 a.m.
Dept.: 55

I, SHAREEKA NORRIS, declare as follows:

1. I am over the age of eighteen and am a named Plaintiff in *Shareeka Norris v. CG Hospitality Group, Inc.* The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto.

2. I submit this declaration in support of Plaintiff's Motion for Approval of Private Attorneys General Act Settlement Agreement.

3. I was previously employed by Defendant in 2023 as a non-exempt hourly employee. During my time working for Defendant, I was subjected to the same wage and hour policies and practices that are at issue in this case, including Defendant's practice of failing to pay employees all wages owed, including off-the-clock compensation, failing to provide meal periods, failing to authorize and permit rest periods, failing to provide accurate wage statements, and related issues.

4. Prior to getting involved in this case, I spoke with my attorneys for many hours to understand the nature of the case, and shared with my attorneys the wage and hour violations that I experienced while working for Defendant. During the informal discovery process, I assisted my attorneys with interpreting various documents produced, and discussed with my attorneys strategies to ensure that the settlement was fair to all of the aggrieved employees.

5. During this case, the parties agreed to go to Mediation, and I worked with my attorneys to prepare for the Mediation. While I did not attend the mediation, I monitored the proceedings and discussed the result of the Mediation with my attorneys after its conclusion.

6. Since the date of the Mediation, I have communicated with my attorneys regarding the settlement terms, and spent several hours reviewing the lengthy settlement agreement, and ensuring that the settlement agreement is fair to the State of California and other aggrieved employees.

7. I have been diligent, and I believe I acted above and beyond that which was expected of me as a representative plaintiff throughout all stages of the litigation, up to and including the settlement of this case.

10. I am also providing a general release in this case of all claims, known and unknown, including all wage claims, against Defendant. This is significant because other aggrieved employees are only releasing claims for penalties, and may pursue their wage claims separately from this case. Given the above, I believe a \$5,000 enhancement fee and general release payment is appropriate, and fair and reasonable in this case.

Executed on October 21, 2024, at CLOVIS, CA 93612, California.

SHARTEKA NORRIS

Shareeka Norris