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6 Attorneys for Plaintiff PRINCESSALEXIA CHANNEL WHITE

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **TULARE COUNTY**

10 PRINCESSALEXIA CHANNEL WHITE, as an
11 individual and on behalf of all employees
12 similarly situated,

13 Plaintiff,

14 v.

15 SGB VENTURES LLC, a Limited Liability
Company; and DOES 1 through 50, inclusive,

16 Defendants.
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Case No.: VCU296946

[Assigned for all purposes to Hon. Gary M.
Johnson, Dept. 7]

**CLASS AND PAGA REPRESENTATIVE
ACTION**

**DECLARATION OF PLAINTIFF
PRINCESSALEXIA CHANNEL WHITE IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS AND PAGA
REPRESENTATIVE ACTION
SETTLEMENT**

Date: January 13, 2025
Time: 8:30 a.m.
Courtroom: Dept. 7
Judge: Hon. Gary M. Johnson

Action Filed: March 27, 2023
Trial: Not Set

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DECLARATION OF PRINCESSALEXIA CHANNEL WHITE

I, PRINCESSALEXIA CHANNEL WHITE, declare as follows:

1. I am a named Plaintiff in this case as an employee of the named defendant, SGB VENTURES LLC ("Defendant"). As such, I have personal knowledge of, or am informed and believe, the following facts herein stated. If called as a witness, I could and would testify competently to the following:

JOB DUTIES AND EXPERIENCES

2. I worked for Defendant during the Settlement Class Period as an hourly employee from approximately June 2022 to October 20, 2022. I was paid on hourly basis and classified as non-exempt from overtime. Throughout my employment, I typically worked 6-7 days per workweek, and typically in excess of 10 hours in a workday.

3. While working for Defendant, I frequently missed or had late or interrupted meal and rest periods. I was also required to work off-the-clock after or before my scheduled shift hours without compensation and was not paid with a proper double time rate when I worked more than 12 hours per shift. Sometimes, I was scheduled to work split shifts when my next shift started two hours after my previous shift but I was not paid any extra premium for working a split shift. While working for Defendant, I had to use my personal cellular phone to download work-related applications and to use those applications to check my work schedules, to communicate with co-workers and supervisors. I also used my personal vehicle to drive to stores to purchase supplies and ingredients for Defendant. I was not reimbursed for my personal cellular phone usage and mileage.

DUTIES OF A CLASS REPRESENTATIVE

4. This lawsuit is not an individual lawsuit. It is a proposed class action. I understand that, if approved as a class representative in this matter, I have an obligation to do my best to look out for the interests of other class members, the current and former employees of SGB VENTURES LLC who I am seeking to represent. I understand that my obligations to the class exist even when the class is certified solely as part of a class action settlement. It is my understanding that, as one part of this duty to the class, I cannot agree to a settlement to benefit myself to the exclusion of the rest of the class

1 members. I have never asked my attorneys to simply settle this matter at any cost. Rather, I have asked
2 them to obtain the best settlement they could within reason, and I believe that they have attempted to do
3 so.

4 5. I have been actively involved in this case since I first retained Tunyan Law, APC. I have
5 never asked to be relieved from my role as a proposed class representative. To the contrary, I have
6 made myself available whenever my attorneys wanted to discuss aspects of my employment at SGB
7 VENTURES LLC, and I remain committed to seeing this matter through to the end.

8 6. I have conferred with my attorneys about the settlement proposed in this case. I am not an
9 accountant, but I understand the factors and risks that need to be considered when evaluating a
10 settlement.

11 7. I am asking to be stand-in for other employees of SGB VENTURES LLC. Because of
12 that, I cannot quit on the Class, and I cannot put myself and my interests before the Class. I accept these
13 duties and request that I be approved as the class representative for purposes of this Settlement.

14 COMMUNITY OF INTEREST: TYPICALITY AND ADEQUACY

15 8. I was an hourly non-exempt employee of Defendant and was subject to the same pay structure
16 and rules as all the other hourly non-exempt employees of Defendant.

17 9. I am not aware of anything special about me that would raise unique defenses to my claims, as
18 opposed to the claims of the class. I am also not suing for anything unique to me. Rather, my claims are
19 based upon the same facts that relate to the rest of the Class.

20 10. I do not believe that I have any conflicts with Class Members included in this proposed
21 Settlement. I do not have any intention to take any action that would place me in a position that is
22 hostile to other Class Members.

23 SERVICE AS A CLASS REPRESENTATIVE

24 11. I believe if not for my stepping forward and taking on the duties of protecting the
25 interests all aggrieved former and current employees of Defendant, it is likely that the interests of the
26 Class would neither have been prosecuted, nor benefited. To my knowledge, other than the litigation
27 encompassed by this proposed Settlement, there is no other litigation, on a Class or individual basis,
28 concerning the claims in this lawsuit. Nor has Defendant pointed to any.

1 12. I have assumed some long-lasting risk in prosecuting this case. Because it is so easy to
2 search for information online these days, I will face an increased risk that future employers will
3 discover information about this lawsuit online and have a negative reaction to learning that I sued an
4 employer. This may make it harder for me to obtain future employment or change jobs for a better
5 opportunity.

6 13. I have devoted a substantial amount of my time, both before this lawsuit was filed and
7 also during its litigation, to ensure a fair result for the employee Class. This involved ongoing
8 communication and participation with my Counsel during the course of this case. My participation
9 began with bringing certain issues that are involved in this matter to my Counsel's attention and
10 explaining the factual background that was used to prosecute the claims in this case. For example, I
11 reviewed documents which I already had, I provided relevant documents to my Counsel, and I
12 explained those documents and related facts to my Counsel to assist them in their review during
13 multiple meetings with my attorneys.

14 14. My efforts continued after the suit was filed. For example, I have had many discussions
15 with the attorneys at Tunyan Law, APC regarding Defendant's wage and hour policies, my claims in
16 this case, litigation strategy, potential witnesses, updates on how the case was proceeding, and how I
17 could help the case. I also discussed strategy with my Counsel. I remained in regular communication
18 with my attorneys regarding discovery and settlement discussions that the parties had during the course
19 of litigation and mediation. I continued to identify employees and other witnesses to counsel, along
20 with other information as to how they could be of potential use in this matter. I also provided
21 substantial information and documents to my attorneys to assist them in preparing the case.

22 15. After the mediation, a long-form settlement agreement was negotiated, and I reviewed it
23 with my Counsel to ensure that its terms are likewise fair and adequate.

24 16. I believe that the Class Representative Service Payment of \$7,000 for me is fair and
25 reasonable. This enhancement takes into consideration the time, effort, risks, stress, and sacrifice of
26 signing a general release of all claims over just wage and hour claims, as well as the benefit provided to
27 all class members as a result of my involvement in this litigation. In sum, in addition to assuming the
28 risks that go along with being a class representative and named plaintiff in litigation, I believe I have

1 also provided well over 30 hours of my time during the course of this litigation to ensure a good
2 outcome for the best interests of the Class. I believe I have been diligent and acted above and beyond
3 that which is expected of a Class Representative throughout all stages of the litigation. I will continue to
4 diligently act as the Class Representative up to and including final approval of the Class Action
5 Settlement.

6 17. Furthermore, it is my opinion that the enhancement is fair and reasonable because in
7 addition to the many hours spent participating in this case, I accepted the potential risk of being liable
8 for the opposing parties' costs if we were unsuccessful in this lawsuit. My attorneys told me these costs
9 could be tens of thousands of dollars or more based on the extent of formal litigation. I believed in this
10 case and was willing to be a Class Representative Plaintiff knowing the risks involved.

11 18. I signed a general release, so I am not only giving up my wage and hour claims, but I
12 am also giving up all claims beyond wage and hour claims I had against my former employer. Since I
13 have signed a general release for any and all claims related to my employment with Defendant, I cannot
14 pursue any other claims against Defendant while Class Members can still pursue other claims not
15 released in this Class Action.

16 19. This litigation has also resulted in a valuable benefit to the Class Members who will
17 participate in the monetary payout of this Settlement because of my involvement. As a result of this
18 Settlement, Class Members are receiving thousands of dollars in Settlement checks.

19 20. Likewise, I risk the potential stigma of being a Class Representative in a Class Action
20 labor dispute, which may affect my future employment in this industry. A Google search with my name
21 and Defendants show that I am a Plaintiff in this Class Action case.

22 22. Based on the time, risk, stress, sacrifice of signing of a general release, and the great outcome
23 of this case, I believe that the requested enhancement for me is fair and reasonable.

24 I declare under penalty of perjury, under the laws of the State of California, that the foregoing is
25 true and correct.

26 Executed 2/26/2024 | 10:35 AM PST

at Visalia, California.

DocuSigned by:

27 
28 **PRINCESS ALEXIA CHANNEL WHITE,**
"Declarant"

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
3) ss
4 COUNTY OF LOS ANGELES)

5 I am employed in the county of Los Angeles, State of California. I am over the age of 18
6 and not a party to the within action; my business address is 535 N Brand Blvd. Suite 285
7 Glendale, CA 91203.

8 On the date indicated below, I served the document described as: **DECLARATION OF**
9 **PLAINTIFF PRINCESSALEXIA CHANNEL WHITE IN SUPPORT OF PLAINTIFF'S**
10 **MOTION FOR FINAL APPROVAL OF CLASS AND PAGA REPRESENTATIVE ACTION**
11 **SETTLEMENT** on the interested parties in this action by sending a true copy thereof to interested
12 parties as follows and as stated on the attached service list:

13 Rissa Stuart
14 rstuart@kschanford.com

15 David Kahn
16 dkahn@kschanford.com

17 Ian Brady
18 ibrady@kschanford.com

19 Maria Cabrera
20 mcabrera@kschanford.com

21 Malarie Moran
22 mmoran@kschanford.com

23 **KAHN, SOARES & CONWAY, LLP**

24 219 N. Douty Street

25 Hanford, CA 93230

26 Telephone: (559) 584-3337

27 Facsimile: (559) 584-3348

28 *Attorneys for Defendant SGB VENTURES LLC*

19 [✓] **BY E-MAIL:** I hereby certify that this document was served from Glendale,
20 California, by e-mail delivery on the parties listed herein at their most recent known e-
21 mail address or e-mail of record in this action.

22 [✓] **BY ELECTRONIC SERVICE:** Based on an agreement of the parties to accept electronic
23 service, I caused the documents to be sent to the persons at the electronic service addresses
24 listed above via electronic mail. I did not receive an error message.

25 I declare under penalty of perjury under the laws of the State of California that the
26 above is true and correct.

27 Executed on December 4, 2024, at Glendale, California.

28 Lilit Tunyan

Name



Signature