

LIDMAN LAW, APC

Scott M. Lidman (SBN 199433)
slidman@lidmanlaw.com
Milan Moore (SBN 308095)
mmoore@lidmanlaw.com
Tiara Gose-Hardy (SBN 323823)
tgose@lidmanlaw.com
2155 Campus Drive, Suite 150
El Segundo, California 90245
Tel: (424) 322-4772
Fax: (424) 322-4775

Attorneys for Plaintiff
DAWN WILLIAMSON

HAINES LAW GROUP, APC

Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff
DAWN WILLIAMSON

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

DAWN WILLIAMSON, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

SEAPORT GROUP ENTERPRISES, LLC, a
California limited liability company; and DOES
1 through 100, inclusive,

Defendants.

Case No. 37-2023-00011420-CU-OE-CTL

*[Assigned for All Purposes to Hon. Joel R. Wohlfeil,
Dept. C-73]*

**DECLARATION OF PLAINTIFF DAWN
WILLIAMSON IN SUPPORT OF MOTION
FOR APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: April 24, 2026
Time: 9:00 a.m.
Dept.: C-73

1 independent contractors for all unpaid wages according to the law and face consequences for not doing
2 so.

3 8. I have been actively involved in this case since joining this lawsuit. Without revealing
4 and/or waiving attorney-client privileged communications, I have communicated with my attorneys on
5 numerous occasions. I estimate that I have spent approximately 15-20 hours meeting with my lawyers
6 concerning the case and my responsibilities as a class representative, which included, among other
7 things, gathering various employment and non-employment related documents for use in the lawsuit,
8 reviewing documents with my lawyers and answering their questions, answering follow up questions
9 and providing guidance regarding Defendant's policies and procedures that Defendant required me and
10 the employees to follow, and helping develop a strategy as to what documents/information to obtain
11 from Defendant. In connection with the settlement in this case, I spent about one hour reviewing the
12 settlement agreement and discussing the agreement and approval process with my attorneys. I made
13 sure to ask my lawyers any questions I had about the terms of the settlement agreement because I wanted
14 to understand everything before I signed it.

15 9. I believe my claims are typical of the members of the Class because they were required
16 to follow the same policies and procedures I was required to follow when I worked for Defendant. I
17 believe Defendant's policies and procedures were the same for all employees in California. Since the
18 same policies and procedures apply to myself and the other employees, I believe they were not provided
19 all legally required meal breaks and did not receive accurate wage statements.

20 10. As far as I am aware, I have no conflicts with any Class Members or PAGA Employees.
21 I understand that as the proposed class representative, I am responsible for representing the interests of
22 all members of the class in litigation to recover money damages for the Class and I consider the interests
23 of the Class and put the interests of the Class before my own interests.

24 11. I understand that my attorneys will request that the Court award me Service Payment of
25 \$7,500.00 for my service and efforts on the case. This proposed \$7,500.00 Service Payment is not
26 contingent upon me supporting the proposed Settlement.
27
28

1 I have reviewed this written statement and fully understand all of its contents. I declare under
2 penalty of perjury under the laws of the State of California that the foregoing is true and correct.
3 Executed on April 3, 2025 at Sandiego, California.

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5 
Dawn Williamson (Apr 3, 2025 12:14 PDT)

6 DAWN WILLIAMSON
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