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Attorneys for Plaintiff Eleanor Jacobs
and Proposed Class Counsel

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF HUMBOLDT

ELEANOR JACOBS, on behalf of herself
and all “aggrieved employees” pursuant to
Labor Code § 2698 *et seq.*,

Plaintiff,

v.

WESTERN LIVING CONCEPTS, a
California corporation, and DOES 1
through 10, inclusive,

Defendants.

CASE NO: CV2300926

Assigned to the Hon. Timothy Canning, Dept. 4

**DECLARATION OF ELEANOR JACOBS IN
SUPPORT OF UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT AND LEAVE TO
FILE FIRST AMENDED COMPLAINT**

DATE: July 29, 2024

TIME: 10:30 a.m.

DEPT.: 4

Action Filed: June 13, 2023

I, ELEANOR JACOBS, hereby declare and state as follows:

1. I am a named Plaintiff in this lawsuit against Defendant Western Living Concepts (“Defendant”) and I submit this declaration in support of Plaintiff’s Unopposed Motion for Preliminary Approval of Class Action Settlement. I am a competent adult and worked for Defendant as a non-exempt employee in Humboldt County during the relevant time period. I have personal knowledge of the facts set forth herein, and if called as a witness to testify to them, I could and would do so competently.

2. I contacted my current attorneys when I questioned the employment practices of Defendant prior to commencing this lawsuit. I accepted the opportunity to act as a Class

1 Representative in a class action on behalf of other employees of Defendant who I believed were
2 being subjected to labor law violations. Although presented with the opportunity, I did not pursue
3 this case on an individual basis and instead did so as a class action so that I could help other
4 employees recover for what I believed were Defendant's illegal practices.

5 3. Specifically, I questioned Defendant's policies of failing to provide all meal and rest
6 periods, failing to timely compensate employees upon separation, and issuing its employees
7 deficient wage statements. Through many discussions with my lawyers, I learned these may be
8 illegal practices and Defendant's employees might have recourse for them.

9 4. By bringing this lawsuit, and throughout its course, I have put the interests of the
10 class ahead of my own. I understood that I could possibly earn a small enhancement payment if
11 this case resolved itself favorably, but always knew that I could also be responsible for paying
12 Defendant's attorneys' fees and costs if it did not. My goal in bringing this lawsuit was to obtain
13 a recovery on behalf of the class, and even more importantly, to put an end to what I believed were
14 illegal practices on the part of Defendant. I believe I have achieved both through this lawsuit and
15 settlement.

16 5. I am very happy about the results of this litigation. I am satisfied that Defendant is
17 compensating class members for premium wages, penalties, and interest that I believe we are due.

18 6. At the onset of this case, I spent time through numerous phone calls with several of
19 my attorneys explaining what I understood to be the policies and procedures of Defendant and
20 how they were applied to me and others I worked with. During the course of this litigation, up
21 through and following the settlement process, I kept actively involved with its status, tracking the
22 status of the case and participating as much as possible.

23 7. While I have not maintained detailed time records of my activities in connection
24 with this litigation, I believe that have spent a total of approximately 21.5 hours assisting my
25 attorneys with the preparation of this case, and doing work and analysis independent from my
26 attorneys both before and during this case, including conducting an independent investigation of
27 the facts.
28

8. Before this litigation commenced, and throughout its course, I have spent approximately 8.5 or more hours gathering, organizing, and reviewing documents and information for this lawsuit. I sifted through many of my own documents and reviewed information produced by Defendant as part of this case.

9. I have communicated with my attorneys several times per month to track my case's status. I have taken an active involvement in this matter throughout its course.

10. This lawsuit will almost certainly result in reputational harm to me. There is a stigma associated with suing anyone, let alone your former employer. I will probably be adversely affected when it comes to obtaining future employment – employers who learn that I sued Defendant in a class action will likely avoid hiring me.

11. I do not believe that I have any conflicts with other members of the class. My interests in bringing this lawsuit – for Defendant to change its labor practices going forward and to compensate current and former employees – are the same as those of all other class members.

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

Executed on this 06 / 21 / 2024th day of June, 2024 at Bedford, Texas.


ELEANOR JACOBS