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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES - SPRING STREET COURTHOUSE

SHANNON BOSTIC, SOCORRO
GAMBOA, individually, and on behalf of
other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiffs,

vs.

LAMP COMMUNITY, an unknown
business entity; LAMP, INC., a California
corporation; THE PEOPLE CONCERN, a
California corporation; and DOES 1
through 100, inclusive,

Defendants.

Case Nos.: 21STCV07381

Honorable Laura A. Seigle
Department SSC17

CLASS ACTION

**DECLARATION OF SOCORRO
GAMBOA IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT,
ATTORNEYS' FEES AND COSTS, AND
ENHANCEMENT PAYMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees and Costs and Enhancement
Payment; Declaration of Class Counsel (Brian
J. St. John) Declaration of Settlement
Administrator (Bryn Bridley); and [Proposed]
Final Approval Order and Judgment filed
concurrently herewith]

Date: October 2, 2024
Time: 9:00 a.m.
Department: SSC17

Complaint Filed: February 24, 2021
FAC Filed: May 12, 2022
SAC Filed: June 20, 2023
Trial Date: None Set

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I, **Socorro Gamboa**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by The People Concern, successor by merger to Lamp, Inc. dba Lamp Community (“The People Concern”) as an hourly-paid, non-exempt employee, from approximately September 2018 to approximately July 2020. I decided to seek legal advice about my experiences with The People Concern about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure The People Concern paid me and other employees what was owed to us and stopped its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **8 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and PAGA representative.

3. I have spent over **12 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as both a class and PAGA representative, which included gathering documents concerning my employment with The People Concern, reviewing documents with my attorneys, answering questions, and providing guidance regarding the duties of hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from The People Concern. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to

1 them as quickly as possible and gave them as much information and identified as many
2 documents as I could. I spent at least **10 additional hours** speaking with my attorneys about the
3 case, identifying potential witnesses, providing my attorneys with documents and information
4 concerning the case, and also describing policies, practices, and procedures of The People
5 Concern.

6 5. As far as the settlement is concerned, I was available to review documents and
7 answer any questions my attorneys had. I spent about **2 hours** reviewing the settlement
8 agreement and about **4 hours** asking questions and discussing the potential settlement with my
9 attorneys before signing the settlement agreement.

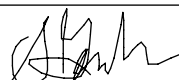
10 6. I believe that I have done everything that my attorneys have asked of me and have
11 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
12 and the State of California. I think my efforts helped to get the result obtained in this case, and
13 as a class and PAGA representative, I respectfully request that the Court award me an
14 enhancement payment in the amount of \$7,500.00 for my active participation in the case. Taking
15 into consideration the time that I have dedicated to this case, I believe that this amount is
16 reasonable.

17 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

18 8. I have not entered into any undisclosed agreements, nor have I received any
19 undisclosed compensation in this case. The only compensation I will receive is whatever amount
20 the Court awards as an enhancement payment, my share of the settlement as a class member and
21 aggrieved employee, and the payment I will receive in connection with the separate confidential
22 individual settlement and release I entered into with The People Concern.

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

25 Executed this ^{04/23} day of April 2024, at Altadena, California.

26 
27 Electronically Signed 2024-04-24 00:02:03 UTC - 172.56.232.234
Nintex AssureSign® 4716a0a0f-d959-4a4c-882f-615b015bcb26

28 Socorro Gamboa