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Attorneys for Plaintiff and Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA

SHYLA THIERRY, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

BAKEMARK USA LLC, a Delaware
limited liability company; and DOES 1
through 50, inclusive,

Defendants.

Case No.: C23-01818

[Assigned for all purposes to the Hon. Edward G.
Weil, Department 39]

**DECLARATION OF SHYLA THIERRY IN
SUPPORT OF MOTION TO APPROVE THE
SETTLEMENT AGREEMENT PURSUANT
TO THE LABOR CODE PRIVATE
ATTORNEYS GENERAL ACT**

Date: _____, 2025

Time: _____ a.m./p.m.

Dept.: 39

Complaint Filed: July 24, 2023

Trial Date: None

DECLARATION OF SHYLA THIERRY

I, Shyla Thierry, declare under penalty of perjury as follows:

1. I am an individual over the age of 18. I am the Plaintiff in the above-referenced action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. This declaration is submitted in support of Plaintiff's Motion to Approve the Settlement Agreement Pursuant to the Labor Code Private Attorneys General Act.

3. I was employed by Defendant Bakemark USA LLC ("Defendant") from on or about May 2, 2022, to on or about May 12, 2023. During my employment with Defendant, I worked in Outside Sales as a representative in Northern California.

4. During my employment, I contend that I was not paid wages by Defendant on a timely basis. I also contend that I was issued inaccurate wage statements that displayed inaccurate pay period and pay dates.

5. I understand that this action was brought on a representative basis on behalf of the State of California and other aggrieved employees of Defendant. I do not have any interests that are adverse to the other employees that are part of the PAGA settlement.

6. I have spent a significant amount of time discussing this matter with my attorneys on many occasions and explaining my understanding of Defendant's practices. To date, I have performed a number of tasks in my role as the representative. This includes discussing this case and the facts involved with my attorneys; searching for and providing documents pertaining to the case; reviewing the files and pleadings, including my paystubs/payroll documents, the PAGA letter, the complaint, and the Settlement Agreement; responding to any questions from my attorneys regarding Defendant's practices; remain available during mediation; and regularly providing information to my attorneys. In total, I estimate that I have spent roughly 30 hours in connection with the prosecution of this lawsuit.

7. I have discussed the terms of the Settlement Agreement with my attorneys, and based on the information provided, I believe the settlement to be fair, reasonable, and adequate

for myself and for all other employees who worked for Defendant.

8. I did not make the decision to join this representative action lightly. I was concerned by the attention a publicly filed lawsuit would attract. My name would be associated with a lawsuit that I filed against my employer. Additionally, because the claims alleged by me involved the payment of costs to the prevailing party, I could have possibly faced paying Defendant's fees and costs, had I not prevailed in this action. I also understood that an individual case would have been resolved much faster than a representative action and involved much less financial risk.

9. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive accomplishment and understand that other people will benefit because of the actions that I have taken.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 13, 2025, at Concord, California.

Signed by:

 76D219AA4BD7400...
 SHYLA THIERRY