

Arrash T. Fattahi (SBN 333676)
arrash.fattahi@wilshirelawfirm.com
 Emily Borman (SBN 303180)
emily.borman@wilshirelawfirm.com
 Lisa B. Iturriaga (SBN 339678)
lisa.iturriaga@wilshirelawfirm.com
 Arman A. Salehi (SBN 351112)
arman.salehi@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
 660 S. Figueroa Street, Sky Lobby
 Los Angeles, California 90017
 Telephone: (213) 381-9988
 Facsimile: (213) 381-9989

Attorneys for Plaintiff

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

NATASHA WINDOM, individually, on behalf
 of all others similarly situated, and on behalf of
 the State of California and other aggrieved
 persons,

Plaintiff,

v.

SKSS ENTERPRISES INC. dba THE UPS
 STORE, a California corporation; and DOES 1
 through 10, inclusive,

Defendants.

Case No.: C23-01274

*Assigned for all purposes to:
 Hon. Edward G. Weil
 Dept. 39*

**DECLARATION OF NATASHA
 WINDOM IN SUPPORT OF
 PLAINTIFF'S MOTION FOR FINAL
 APPROVAL OF CLASS ACTION AND
 PAGA SETTLEMENT**

FINAL APPROVAL HEARING

Date: March 5, 2026
 Time: 9:00 a.m.
 Dept.: 39

Complaint filed: May 26, 2023
 FAC filed: December 7, 2023

DECLARATION OF NATASHA WINDOM

I, Natasha Windom, declare as follows:

1. I am an adult resident of the State of California, and if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am a former employee of SKSS ENTERPRISES INC. dba THE UPS STORE (“Defendant”). I worked for Defendant from approximately May 2020 to approximately February 2023 as an hourly-paid non-exempt employee. Throughout the entirety of my employment, I was subject to all of Defendant’s policies and practices that have been alleged as unlawful in the Private Attorneys General Act (“PAGA”) Notice sent to Defendant and the Labor & Workforce Development Agency and in the Complaint.

4. I initiated this lawsuit because I was concerned that I was not paid properly for all the hours that I worked, and I was not provided with all my meal and rest periods.

5. By originating this lawsuit, I hoped that I might be able to change Defendant’s policies to better protect the working conditions of my co-workers. I also understand that it was my duty to represent the best interests of the aggrieved employees, to know about the lawsuit, to assist my attorneys, and to keep updated on the case.

6. I have invested a lot of personal time and energy into this lawsuit. As detailed more fully below, I have spent approximately 30 hours on this case. I made it a priority to be actively involved because I wanted to do everything I could to assist my attorneys in prosecuting this case.

7. Throughout this case, I spent a lot of time on the phone with my attorneys to get updates about the case and provide them with information. For example, during some of the phone calls, my attorneys and I were able to identify instances when I was not paid correctly.

1 Additionally, leading up to the mediation, I had multiple lengthy phone calls with Wilshire Law
2 Firm, PLC regarding the claims at issue and what was to transpire at the mediation.

3 8. Throughout the case, I also spent time looking for documents relevant to the case to
4 send to my attorneys. I spent numerous hours looking for documents, including when I first contact
5 my attorneys, before the lawsuit was filed, and before my case was mediated. I also spent time
6 reviewing legal documents in this case, including the retainer and settlement agreement and
7 discussed, in detail, the terms with my attorneys.

8 9. Additionally, I made myself fully available on the day of mediation and was in
9 continuous contact with my attorneys to assist with any questions or issues that may have arisen.

10 10. I believe the settlement is a good settlement and I would recommend that the Court
11 approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad that I
12 had the opportunity to represent the aggrieved employees in this lawsuit and that I was able to
13 recover money through a settlement for the aggrieved employees.

14 11. I did not make the decision to file this action lightly. I was concerned by the attention
15 a publicly filed lawsuit, and especially a representative action, would attract. My name would be
16 associated with a lawsuit that I filed against my former employer. I am mindful that prospective
17 employers might find out that I sued Defendant. Nevertheless, I felt that important rights were at
18 stake, that others were being harmed, and that something ought to be done about it.

19 12. I also understand that there was financial risk in bringing this lawsuit. For example,
20 I knew that if I did not prevail in this lawsuit that I could potentially be responsible for Defendant's
21 attorneys' fees and costs.

22 13. I understand that the settlement agreement provides a service payment to me in the
23 amount of \$10,000.00. I believe this amount is fair compensation for my time and effort on this
24 case, my help in prosecuting this case, and the risks with respect to my future employment.

25 14. Based on my involvement in this case and the benefits provided to my former co-
26 workers, I can say I helped stand up for the other workers who might have been too afraid to say
27 anything to management because they did not want to risk losing their jobs or risk the stigma of
28 suing an employer. I was not afraid to take that risk because I strongly care about helping out my

former co-workers.

15. I carefully reviewed and ultimately signed the Class Action and PAGA Settlement Agreement and my attorneys answered all the questions I had. I believe the settlement terms and allocations are fair, adequate, and reasonable given the strength of the Class Action and PAGA claims and Defendant's defenses.

16. I have no conflicts of interest with any aggrieved employee or the settlement administrator, Apex Class Action, LLC.

17. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

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

Executed on February 9, 2026, at Antioch, California.

DocuSigned by:

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Natasha Windom