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Attorneys for Plaintiff Fazon Williams and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CHRIS MOORER, individually, and on behalf of
other members of the general public similarly
situated; FAZON WILLIAMS, 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;

vs.

PROVANTAGE CORPORATE SOLUTIONS,
LLC, a limited liability company; and DOES 1
through 50, inclusive,

Defendants.

Case No. 21STCV24842

Related to Case No. 23STCV13610

[Hon. Carolyn B. Kuhl, Department 12]

**DECLARATION OF FAZON WILLIAMS IN
SUPPORT OF PLAINTIFF’S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: February 25, 2025
Time: 10:30 a.m.
Department: 12

Complaint Filed: July 7, 2021
FAC Filed: November 4, 2024

I, Fazon Williams, declare as follows:

1. I am an individual over the age of 18. I am the named plaintiff in the above-reference action. I have personal knowledge of the facts set forth below, except as to those matters stated on information and belief and, as to those matters, I believe them to be true. If called as a witness, I could testify competently as to the matters stated in this declaration.

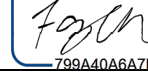
2. On or about May 8, 2022, I was hired to work for Defendant Provantage Corporate Solutions, LLC ("Defendant") as a non-exempt remodel merchandiser. My employment ended on or about June 16, 2022. During my employment, I contend that I was not paid all minimum and overtime wages for all hours worked, provided with off-duty meal and rest periods, and reimbursed business expenses. I also contend that I did not receive accurate itemized wage statements and was not paid all of my owed wages at the end of my employment.

3. I have taken all necessary steps to represent the interests of the Class, including by providing information and documents to my counsel, discussing the claims and lawsuit with my counsel, and answering any questions that have come up, including about how I was paid or what my wage statements show or meant. I understand that I am responsible to the Class with respect to trying the case, appearing in court, and working with Class Counsel. I am willing to act as a fiduciary for the Class. I remain willing to devote my time to this lawsuit for the benefit of the Class. I do not believe I have any interests that are adverse to the interests of the Class. I also am unaware of any such issues having been raised or presented by anyone else.

4. I believe many employees would not sue their employer out of fear. I took on risks by bringing this lawsuit, and I understand that other people will benefit because of the actions that I have taken. I feel that it is a positive accomplishment, am proud of the result, and believe that the class settlement is fair, adequate, and reasonable. I also understood that by bringing this action, I could have been potentially liable for Defendant's costs if I lost.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 13th day of December 2022, at Lancaster, California.

Signed by:



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Fazon Williams

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