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Attorneys for Plaintiff MARICHU JEFFRIES, on
behalf of herself, all others similarly situated, and
on behalf of the general public.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

MARICHU JEFFRIES on behalf of
herself, all others similarly situated, and
on behalf of the general public,

Plaintiff,

v.

THE MEADOWS AT COUNTRY
PLACE, LLC; and DOES 1-100,

Defendants.

Case No.: 23CV003530

**DECLARATION OF MARICHU
JEFFRIES IN SUPPORT OF
SETTLEMENT APPROVAL**

1 I, Marichu Jeffries, hereby declare under penalty of perjury as follows:

- 2 1. I have personal knowledge of all matters stated herein, and if called as a witness, I could
3 and would competently testify thereto, except as to those matters stated upon information
4 and belief, and as to those matters, I believe them to be true.
- 5 2. I am the named Plaintiff and Class Representative in the above-captioned lawsuit, and I
6 submit this declaration in support of settlement approval.
- 7 3. I worked for Defendant The Meadows at Country Place, LLC ("Meadows") as a non-
8 exempt, hourly employee in California during the Class Period.
- 9 4. Since becoming a class representative, I have diligently worked on this case. I always
10 answered phone calls from my attorneys or called them back promptly when they called.
- 11 5. On many occasions, I spoke with my attorneys for case related purposes. I assisted my
12 attorneys in investigating the case and reached out to them on numerous occasions to
13 provide them with information about my time at Meadows that I thought might help the
14 case.
- 15 6. I also looked for any paperwork or documents, like my paystubs, from my employment
16 with Meadows to provide to my attorneys.
- 17 7. Anytime a class member contacted me regarding the case or had any questions about what
18 was going on or how they could help, I would always tell them to contact my attorneys to
19 see if they were able to help with the case at all.
- 20 8. I was aware that, at some point in this case, I would have my deposition taken. I knew that
21 the deposition could take a full day and that I may have to meet with my attorneys prior
22 to my deposition. I was at all times ready and willing to sit for my deposition.
- 23 9. Although I did not attend the mediation in person, I was available on the phone for all the
24 negotiations. I spoke with my attorneys regularly throughout the entire day to provide
25 additional information my attorneys asked for and was kept informed on the status of the
26 negotiations.
- 27 10. I gave my consent to settle with Meadows for the gross settlement amount of \$180,000. I
28 completely and carefully reviewed the memorandum of understanding and the settlement

1 agreement. I then signed both the memorandum of understanding and settlement
2 agreement.

3 11. I estimate that I spent approximately 29 hours or more on tasks like speaking with my
4 attorneys, searching for documents, speaking with other employees, assisting in
5 mediation, and reviewing the settlement documents.

6 12. In light of the work I performed in this case and the duties associated with being a class
7 representative in a case of this magnitude, I believe the \$2,500 class representative
8 enhancement payment is reasonable. I understand that this additional payment is not
9 guaranteed and is subject to Court approval.

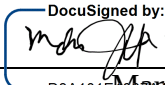
10 13. I have and will continue to adequately represent all of the interests of the class. With my
11 status as class representative, I will treat the interests of the Class above my interests.

12 14. My claims are typical of the Class Members because I am similarly situated to all current
13 and former non-exempt, hourly employees who worked for Meadows in California at any
14 time during the Class Period. Thus, my interests are the same as all members of the
15 proposed Class.

16 15. I recognize that any resolution of this matter must be approved by the Court in terms of
17 whether the settlement is fair and reasonable, and that I am obligated to protect the
18 interests of all of class members for the Class Period.

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

21 Dated: 12/20/2024

22 By: 
23 DocuSigned by:
24 D3A101E1M140D0 Marichu Jeffries