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

VANESSA HERNANDEZ, LAVONTRA
BREAUX, NARON TRIPLETT, and
NATALIE FLORES Individually, and on
behalf of other members of the general public
similarly situated,

Plaintiffs,

v.

PANDORA JEWELRY LLC, a Maryland
Limited Liability Company; PANDORA
VENTURES, LLC, a Maryland Limited
Liability Company; and DOES 1-10,
inclusive

Defendants

CASE NO. 24STCV04554 [Related Case Nos.:
23SMCV04825; 24SMCV00844;
24STCV04697; and 24STCV15396]

**CLASS ACTION DECLARATION OF
NATALIE FLORES IN SUPPORT OF
PLAINTIFF’S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

DECLARATION OF NATALIE FLORES

I, Natalie Flores, state and declare:

1. I am the Plaintiff in the above-captioned action and have personal knowledge of all matters stated herein, and could competently testify thereto. I make this declaration in support of the motion for preliminary approval of the class action settlement.

2. I believe the settlement is fair and reasonable and constitutes a fair resolution of the alleged claims.

3. During my employment with Defendant, several issues concerned me, which I thought did not comply with California law, such as not being paid for all overtime wages, not being provided proper meal periods and rest breaks, failure to pay sick time and provide written notice of paid sick leave, failure to pay all vacation wages, wage statement violations, waiting time penalties, failure to reimburse necessary business expenses, unfair competition, and PAGA penalties. Even though I was unsure if I wanted to bring a lawsuit because of the risk of stepping forward as a whistle-blower (since this could jeopardize my livelihood in the industry and make it difficult to find future jobs), I retained my attorneys to proceed with this class action because I did not think that myself or the other employees were being treated correctly.

4. When I first retained my attorneys and chose to pursue this case on a class action basis, I understood that I had specific burdens as the "Class Representative," which included: (a) representing the interests of all class members, (2) considering the interests of all class members above my interests, (3) participating actively in the lawsuit, including deposition, and keeping generally aware of the status and progress of the lawsuit. Moreover, I understood that any resolution of the lawsuit is subject to court approval and must be designed in the best interests of the class as a whole.

5. I respectfully request that the court approve the service award for the following reasons.

6. First, I have spent a substantial amount of time working on this case and have performed significant services for the Class to help obtain a highly beneficial settlement for my fellow employees.

1 7. On or about February 2, 2024, I initiated a Class Representative Action
2 Complaint in the Superior Court of California, Los Angeles County. This action represents my
3 interests and those of all other current and former non-exempt employees similarly situated. I
4 later dismissed my action and joined this matter as one of the Plaintiffs. Subsequently, the
5 complaint was amended to include a cause of action under the Private Attorney General Act
6 (“PAGA”) on behalf of myself, the State of California, and other similarly aggrieved
7 employees.

8 8. Since initiating this action, I estimate I have spent approximately 25-30 hours
9 engaging in activities to benefit the class. I have assisted my attorneys in numerous ways,
10 including helping to explain and discuss the company’s practices and procedures, locating and
11 analyzing company documents, and communicating with other class members. These efforts
12 occurred through numerous meetings with Class Counsel, telephone conferences, letters, emails,
13 and text communications. I also spent a substantial amount of time assisting with the preparation
14 for mediation.

15 9. My work also continued after mediation, as I reviewed settlement agreements
16 and other related documents, and maintained communication with my lawyers throughout the
17 settlement approval process.

18 10. Second, I respectfully request that the Court approve the agreed-upon service
19 award because I agreed to set aside my interests and put the class interests ahead of or on par
20 with my own. In doing so, and by successfully bringing this case as a class action, I helped to
21 obtain a highly beneficial settlement for the class members.

22 11. Third, as a condition of this class action settlement, I was required to release and
23 waive all possible individual claims against the company, a requirement that none of the other
24 class members were subject to.

25 12. Fourth, by bringing this case as a class action, I undertook significant risks and
26 stresses at a high emotional cost without any guarantee of success. For example, filing this
27 lawsuit and being a whistleblower was stressful on a daily basis, as I constantly worried about
28 the risk that this case could impact my ability to find future jobs. This stress and risk persisted

1 throughout the entire case, and I'm concerned it may hinder my job prospects in the future,
2 given that the case information is publicly available online.

3 13. Fifth, bringing this case also came with a major financial risk because, if I lost
4 the case, I would be required to pay the company's costs, and there was a chance they could try
5 to make me pay their attorneys' fees as well.

6 14. I affirm my unwavering dedication to representing the interests of the putative
7 class and aggrieved employees. I voluntarily assumed considerable risks and expended
8 considerable effort to secure a favorable outcome. I trust that the Court will duly consider my
9 request for a Service Award in recognition of these contributions.

10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing

12 is true and correct. Executed on 11/12/2025, at Tustin, California.

13 Signed by:

14 *Natalie Flores*
[REDACTED]

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