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Attorneys for Plaintiff LAVONTRA BREAUX, Individually and on behalf of other members of the general public similarly situated.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

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,

vs.

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]

DECLARATION OF LAVONTRA BREAUX IN SUPPORT OF PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF (1) CLASS ACTION SETTLEMENT; (2) ATTORNEYS' FEES AND COSTS; and (3) CLASS REPRESENTATIVE AWARDS

Date: December 11, 2025

Time: 9:30 a.m.

Dept.: 12

Judge: Hon. Carolyn B. Kuhl

1 I, LaVontra Breaux, hereby declare as follows:

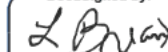
- 2 1. I am the named Plaintiff in the above-captioned matter. I make this declaration in support of
3 Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement.
- 4 2. I have personal knowledge of the facts set forth in this declaration and if called to testify as a
5 witness, I could and would do so.
- 6 3. To my recollection, I personally met with my Attorneys on at least 5 occasions. Several of those
7 meetings lasted in excess of one hour.
- 8 4. During these meetings, I would review and explain numerous documents turned over by
9 Defendants from my employment. I would also explain my (as well as others') role during
10 work. I also helped identify numerous other employees who could support the claims I was
11 making in this lawsuit.
- 12 5. I also spoke with my attorneys on the phone on at least 13 other occasions.
- 13 6. In total, I estimate that I spent at least 30 hours related to the above mentioned tasks directly
14 working with my attorneys. I also estimate I spent at least another 5 hours of my own time
15 gathering evidence and outlining issues that I later shared with my attorneys.
- 16 7. When I decided to move forward with this case, I was counseled by my attorneys of the
17 potential stigma of being a Representative in a "Wage and Hour," dispute, as this is a publicly
18 filed lawsuit.
- 19 8. I was also advised when I brought this case that had we lost, I could have been personally liable
20 for paying all of Defendants' costs. I was further advised this could be well into the tens of
21 thousands of dollars on this type of case.
- 22 9. Despite these risks I was committed to achieving a settlement that would benefit all employees
23 working for Pandora Jewelry LLC and/or Pandora Ventures, LLC.
- 24 10. I am not related to anyone associated with Lawyers for Justice, PC, Sullivan & Yaeckel Law
25 Group, APC, Bokhour Law Group, P.C., Falakassa Law, P.C., and Bibiyan Law Group, P.C.

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1 11. I have not entered into any undisclosed agreements, nor have I received any undisclosed
2 compensation in this matter. The only compensation I will receive is whatever amount the Court
3 awards as a service award, as well as my share of the settlement as a class member and
4 aggrieved employee.

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6 I declare under penalty of perjury under the laws of the State of California that the foregoing is
7 true and correct. Executed this 19th day of November, 2025.

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9 DocuSigned by:



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LAVONTRA BREAux