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**ZAKAY LAW GROUP, APLC**

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Attorneys for PLAINTIFFS

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF LOS ANGELES**

ALEXIS BARTRAM and LOURDES  
CONTRERAS, individuals, on behalf of  
themselves and on behalf of all persons  
similarly situated,

Plaintiffs,

v.

LAKESHORE LEARNING MATERIALS,  
LLC, a California limited liability company;  
and DOES 1-50, Inclusive,

Defendant.

Case No: 23STCV21174

**DECLARATION OF SHANI O. ZAKAY, ESQ.  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS AND PAGA ACTION SETTLEMENT**

Date: March 5, 2025

Time: 9:00 a.m.

Judge: Hon. Lauren A. Seigle

Dept.: 17

1 I, SHANI O. ZAKAY, declare as follows:

2 1. I am the managing partner of the law firm of Zakay Law Group, APLC, co-counsel of  
3 record for Plaintiff Alexis Bartram and Plaintiff Lourdes Contreras in this matter. As such, I am fully  
4 familiar with the facts, pleadings, and history of the matter. The following facts are within my own  
5 personal knowledge, and if called as a witness, I could testify competently to the matters stated herein.

6 2. This Declaration is being submitted in support of Plaintiffs' Motion for Preliminary  
7 Approval of Class and PAGA Action Settlement.

8 3. My firm has worked on this matter over the course of the litigation during the last twenty  
9 months. My credentials are reflected in the Zakay Law Group, APLC firm resume, a true and correct  
10 copy of which is attached hereto as **Exhibit A**. Some of the major cases my firm has undertaken is also  
11 set forth in **Exhibit A**. I have had class litigation experience, mostly in the area of employment class  
12 actions, unfair business practices, and other complex litigation. I have experience in cases involving  
13 labor code violations and wage and hour claims. I have litigated similar wage and hour cases against  
14 other employers on behalf of employees. I have been approved as experienced class counsel in courts  
15 throughout California. It is this level of experience which enabled my firm to undertake the instant  
16 matter and to successfully combat the resources of the defendant and its capable and experienced  
17 counsel.

18 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
19 true and correct. Executed this 22nd day of January 2025, at San Diego, California.

20 I do not believe I have any actual or potential conflicts with the Class Members and or the  
21 Administrator. Further, I have no interest in, monetary or otherwise, the Settlement Administrator.  
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24 By:   
25 Shani O. Zakay, Esq.  
26 Attorney for PLAINTIFFS  
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