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Attorneys for KENTON SAMUELS, on behalf of himself,  
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**

KENTON SAMUELS on behalf of  
himself, all others similarly situated, and  
on behalf of the general public,

Plaintiffs,

v.

WIS INTERNATIONAL, INC.; CHI  
MANAGEMENT GROUP LP;  
CROSSMARK, INC.; and DOES 1-100,

Defendants.

Case No. 23CV012186  
(Consolidated with Case No. 24CV00311)

*[Assigned for all purposes to the  
Honorable Jill Talley; Dept. 23]*

**DECLARATION OF PLAINTIFF KENTON  
SAMUELS IN SUPPORT OF  
SETTLEMENT APPROVAL**

Date Filed: November 22, 2023  
Trial Date: None Set

I, Kenton Samuels, hereby declare under penalty of perjury as follows:

1. I have personal knowledge of all matters stated herein, and if called as a witness, I could and would competently testify thereto, except as to those matters stated upon information and belief, and as to those matters, I believe them to be true.
2. I am the named Plaintiff and Class Representative in the above-captioned lawsuit, and I submit this declaration in support of settlement approval.
3. I worked for Defendants Retail Services WIS Corp. dba WIS International; Crossmark, Inc., and/or CHI Management Group, LP (“Defendants”) as a non-exempt employee in California. I started working for Defendants in approximately 2018 and was employed by Defendants when I filed this lawsuit. After filing this lawsuit, my employment ended in approximately mid-2025.
4. I originally decided to contact an attorney because I felt that some of Defendants’ policies and practices violated the law.
5. Since becoming a class representative, I have diligently worked on this case.
6. I always answered phone calls from my attorneys or called them back promptly when they called. I also promptly responded to emails sent by my attorneys.
7. This case has been pending for over two years. During the entirety of this time, I have worked diligently to help progress it forward. I have spent many hours in prosecuting this case.
8. On many occasions, I spoke with my attorneys for case related purposes. I assisted my attorneys in investigating the case and reached out to them to provide them with information about my time working for Defendants that I thought might help the case.
9. I also looked for any paperwork and documents from my employment with Defendants, like my paystubs, to provide to my attorneys.
10. I was aware that, at some point in this case, I would have my deposition taken. I knew that the deposition could take a full day and that I may have to meet with my attorneys prior to my deposition. I was at all times ready and willing to sit for my deposition.

- 1 11. Although I did not attend the mediation in person, I was available by phone. I also was
- 2 kept apprised of settlement negotiations that occurred after mediation and consented to the
- 3 settlement.
- 4 12. I completely and carefully reviewed the Memorandum of Understanding (“MOU”) and
- 5 settlement agreement. I then signed the MOU and settlement agreement.
- 6 13. I estimate that I spent approximately 35 hours or more in prosecuting this case.
- 7 14. In light of the work I performed in this case and the duties associated with being a class
- 8 representative in a case of this magnitude, I believe the \$15,000 class representative
- 9 enhancement payment is reasonable. I understand that this additional payment is not
- 10 guaranteed and is subject to Court approval.
- 11 15. I have and will continue to adequately represent the interests of the class. With my status
- 12 as class representative, I will treat the interests of the class above my interests.
- 13 16. I initiated this lawsuit on behalf of myself and the other employees. From the very
- 14 beginning, I understood that I was participating in this case, not only for my own benefit,
- 15 but for the many past and present hourly employees.
- 16 17. I brought this case on behalf of myself and other similarly situated employees who will not
- 17 benefit along with myself for my decision to bring this matter as a class action.
- 18 18. My claims are typical of the Class Members because I am similarly situated to all current
- 19 and former non-exempt California employees who worked for any of the Defendants in
- 20 California at any time from November 22, 2019, through June 7, 2025. Thus, my interests
- 21 are the same as all members of the proposed Class.

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

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

6 Dated: 2/20/2026

7 By: \_\_\_\_\_

DocuSigned by:  
*Kenton Samuels*  
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Kenton Samuels