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Attorneys for Plaintiffs and the Class

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

CAMERON FLETCHER,
individually, and on behalf of other
members of the general public
similarly situated; KATRINA
WILSON, individually, and on behalf
of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General
Act;

Plaintiff,

vs.

TRIPLE B CORPORATION d/b/a
CHARLIES PRODUCE, a Washington
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 2:22-CV-03053-DMG-MAA

Honorable Dolly M. Gee
Courtroom 8C

**DECLARATION OF KATRINA
WILSON IN SUPPORT OF
PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS
ACTION AND PAGA
SETTLEMENT, CLASS
COUNSEL AWARD, SERVICE
AWARDS, AND
ADMINISTRATIVE COSTS**

[Notice of Motion and Motion for
Final Approval of Class Counsel
Award, Service Awards, and
Administrative Costs; Declaration of
Class Counsel (Joanna Ghosh);
Declaration of Class Representative
(Cameron Fletcher); Declaration of
Settlement Administrator (Gillian
McCreedy); and [Proposed] Order
Awarding Class Counsel Award,
Service Awards, and Administrative
Costs filed concurrently herewith]

Date: December 6, 2024
Time: 10:00 a.m.
Courtroom: 8C

Complaint Filed: February 22, 2023
FAC Filed: February 16, 2024
Trial Date: None Set

DECLARATION OF KATRINA WILSON

I, Katrina Wilson, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I have been employed by Triple B Corporation d/b/a Charlies Produce (“Triple B”) in an hourly-paid, non-exempt position from approximately November 2018 to present. I decided to seek legal advice about my work experiences with Triple B. I met with Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure that Triple B was held accountable for not properly compensating aggrieved employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits and representative action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **6 hours**. Afterwards, I consulted with the attorneys at Lawyers *for* Justice, PC for **12 hours** discussing my situation, complex wage-and-hour class actions and representative action lawsuits under the Private Attorneys General Act (“PAGA”) generally, and what it meant to join the lawsuit, be a named plaintiff class representative, and PAGA representative.

3. I have spent over **10 hours** meeting with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Triple B, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance regarding the duties of non-exempt employees. I checked in with my attorneys and their staff to make sure they had all of my most current information and any additional information that I had obtained.

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1 4. I was available to answer any questions my attorneys had, and
2 available to speak and meet with my attorneys whenever they needed me. I
3 responded to them as quickly as possible and gave them as much information and
4 identified as many documents as I could. I spent at least **6 additional hours**
5 speaking with my attorneys about the case, identifying potential witnesses,
6 providing my attorneys with documents and information concerning the case, and
7 also describing policies, practices, and procedures of Triple B.

8 5. As far as the settlement is concerned, I was available to review
9 documents and answer any questions my attorneys had. I spent about **3 hours**
10 reviewing the settlement documents and about **4 hours** asking questions and
11 discussing the settlement with my attorneys before signing the settlement
12 agreement.

13 6. I believe that I have done everything that my attorneys have asked of
14 me and have tried, to the best of my ability, to represent the class. I think my
15 efforts have helped to obtain the result in this case, and as a class and PAGA
16 representative, I respectfully request that the Court award me a service award in
17 the amount of \$10,000.00 for my active participation in this case. Taking into
18 consideration the time that I have dedicated to this case, I believe that this amount
19 is reasonable.

20 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

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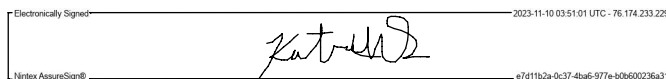
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1 8. I have not entered into any undisclosed agreements, nor have I
2 received any undisclosed compensation in this case. The only compensation I will
3 receive is whatever amount the Court awards as a service award, as well as my
4 share of the settlement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

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

7 Executed this ^{11/09/2023} ____ day of November 2023, at Ontario, California.

8  Electronically Signed: 2023-11-10 03:51:01 UTC - 76.174.233.229
Nintex AssureSign® e7d11b2a-0c37-4ba6-977e-b0b600236a31

9 Katrina Wilson

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