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(Additional Counsel on Next Page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF NEVADA

AMANDA POWELL, 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.

BRIARPATCH COOPERATIVE OF
NEVADA, INC., a California corporation;
BRIARPATCH FOOD CO-OP, an unknown
business entity; NEVADA COUNTY
BRIARP, an unknown business entity; and
DOES 1 through 100, inclusive,

Defendants.

Case No. CU0001207

**DECLARATION OF AMANDA POWELL IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT**

Date: December 19, 2025

Time: 10:00 a.m.

Judge: S. Robert Tice-Raskin

Dept.: 6

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1 I, AMANDA POWELL, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am the named Plaintiff in the above
4 wage and hour class action filed against BRIARPATCH COOPERATIVE OF NEVADA, INC.,
5 BRIARPATCH FOOD CO-OP, and NEVADA COUNTY BRIARP (hereinafter "Defendants").

6 2. This declaration is being submitted in support of Plaintiff's motion for Final Approval of
7 Class Action and PAGA Settlement.

8 3. I retained Class Counsel in October 2023 and filed the lawsuit in February 2024. I filed
9 the case on behalf of myself and a class of individuals who are or were employed by Defendants as
10 non-exempt employees in the State of California during the Class Period, defined as the period starting
11 February 5, 2020, through June 30, 2024.

12 4. I worked for Defendant as a non-exempt employee in Nevada County from August of
13 2021 to January of 2023.

14 5. I filed the case because I believed my rights as an employee were violated by Defendant
15 as were the rights of other employees who worked for Defendant. Among other claims, I believe
16 Defendant failed to pay me for all hours worked and failed to provide legally compliant meal and rest
17 periods.

18 6. Before I initiated the case as the plaintiff and Class Representative, I spoke at length with
19 my attorneys. We discussed my work experience and how company policies were applied to me and
20 other employees. I provided the attorneys with documents they requested. We reviewed the documents
21 together and asked and answered many questions regarding my experience working for Defendant, the
22 litigation process, and about class actions generally.

23 7. During these conversations, I learned about my responsibilities as the plaintiff in the
24 lawsuit and as the proposed Class Representative. I understood that pursuing this action as a class
25 action rather than merely seeking my individual claims substantially increased the risk to me. Those
26 risks included the possibility of being held liable for Defendant's attorneys' fees and costs in a complex
27 class action if I lost the case. I also understood that as the Class Representative, I would be under
28 increased scrutiny by the attorneys and the Court because I needed to prove that I was an adequate class

1 representative. Further, I understood that I would lose some autonomy over my individual claims as I
2 could not make decisions for my sole benefit and that I needed to make every litigation decision with
3 the best interests of the Settlement Class in mind.

4 8. I also understood that pursuing this litigation created a very public record of my
5 grievances with Defendant which produced the risk that a future employer could hold it against me that
6 I sued a former employer.

7 9. I also knew that I was making a sacrifice in that I could have pursued my claims only on
8 an individual basis, likely obtaining a recovery greater than the portion of the class settlement I stand
9 to receive from this settlement. My attorneys explained to me that the net settlement value of my
10 individual claims may be greater than my ultimate recovery from the net class settlement amount.

11 10. Notwithstanding these risks and sacrifices, I decided to go through with the case because
12 I believed violations occurred and most employees would not know what their rights are and even if
13 they did, they would be apprehensive to file a lawsuit against their employer for fear of retaliation.

14 11. During the lawsuit I communicated on a regular basis with my attorneys. I reviewed
15 status updates from my attorneys and court filings on a regular basis, and spoke to my attorneys on the
16 phone, because I wanted to keep up with developments in the case which I understood was one of my
17 duties as a class representative.

18 12. **Review and Approval of Settlement:** A mediation was held on November 11, 2024,
19 and again on December 2, 2024. Even though I could not attend, I was available by telephone to speak
20 with my attorneys and did speak with them regarding the mediation before it took place, as well as
21 during the mediation itself. I also spoke with my attorneys after both mediation dates and discussed
22 the proposed settlement. I was very satisfied with the terms of the settlement that was agreed to by the
23 parties. When the settlement papers were ready, I again spoke with my attorneys and reviewed the
24 settlement agreement which I signed on February 20, 2025.

25 13. **Participation:** Since I retained Class Counsel over two years ago, I have been actively
26 involved with this class action lawsuit performing the duties described above. While I did not keep
27 formal time records, I was in regular contact with my attorneys, reviewed important court filings, and
28

1 spent considerable time on the issues presented during the litigation and in the settlement process. I
2 estimate that I spent approximately 20 to 30 hours working on this case.

3 14. Also, my attorneys explained to me that the settlement process involved a two-step
4 review by the Court to determine whether the settlement was fair before ordering that the settlement be
5 funded and paid. I knew this process also involved notifying all class members of the settlement terms
6 and of their rights to make a claim for their settlement share, to opt out of the settlement or to object to
7 the settlement.

8 15. Ultimately, I believe I did the right thing in pursuing this case on behalf of the class who
9 now stand to receive substantial monetary payments as a result of this case and settlement. I also
10 believe that the requested Class Representative Enhancement in the amount of \$10,000.00 from the
11 settlement is fair compensation for the (1) the work I performed, (2) the sacrifices made not pursuing
12 this case individually, and (3) the risks I undertook.

13 16. In light of all the time and effort I have spent on this case, the sacrifice I have made, the
14 risks I undertook by suing a former employer, the exposure to being responsible for paying Defendant's
15 costs in the event we did not win the case as well as putting my name on a lawsuit that is public record,
16 and in light of the size of the settlement, I believe the request for \$10,000.00 as a Class Representative
17 Enhancement is fair and reasonable.

18 17. Further, I support my attorneys' application for an award of attorneys' fees in the amount
19 of up to \$327,500.00, plus costs of up to \$40,000 for reimbursement of actually incurred litigation
20 expenses.

21
22 I declare under the penalty of perjury under the laws of the State of California that the foregoing
23 is true and correct. Executed 11/20/2025, at Auburn, California

24
25 By:  Amanda Powell (Nov 20, 2025 11:45:07 PST)
26 AMANDA POWELL
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