

1 Joseph Lavi, Esq. (SBN 209776)
jlavi@lelawfirm.com
2 Vincent C. Granberry, Esq. (SBN 276483)
vgranberry@lelawfirm.com
3 William Tran, Esq. (SBN 335908)
wtran@lelawfirm.com
4 **LAVI & EBRAHIMIAN, LLP**
8889 W. Olympic Boulevard, Suite 200
5 Beverly Hills, California 90211
Telephone: (310) 432-0000
6 Facsimile: (310) 432-0001

7 Attorneys for Plaintiff MONET L. STERLING,
on behalf of herself and current and former aggrieved employees

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **COUNTY OF LOS ANGELES**

11 MONET L. STERLING, on behalf of herself
and current and former aggrieved employees

12
13 Plaintiff,

14 vs.

15 DOTHAN SECURITY, INC.; and DOES 1
to 100, inclusive,

16
17 Defendants.

Case No.: 23STCV08293

Assigned for All Purposes to:
Hon. Bruce G. Iwasaki
Dept. 58

DECLARATION OF MONET L. STERLING

Date: January 22, 2025
Time: 9:00 am
Dept.: 58

Reservation ID: 142991704662

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1 settlement. I participated in the litigation and provided my lawyers with information and documents
2 regarding my employment with Defendant.

3 6. I believe that the proposed settlement obtained on behalf of the other aggrieved
4 employees is excellent in view of the issues and risks involved with the case.

5 7. I believe I have fulfilled my duties as named plaintiff and PAGA representative, which
6 required a significant amount of time and effort during the course of this case. These efforts required
7 dedicating numerous hours to lawsuit activities including, but not limited to: (a) communicating with
8 my attorneys to stay informed of ongoing developments in the case and to discuss the proposed
9 settlement ultimately negotiated; (b) searching for and providing documents and other materials
10 relating to my work experience; (c) responding to requests for information relating to my work
11 experience; and (d) reviewing filings and key documents including drafts of the complaint and the
12 settlement agreement. These tasks required my dedication of at least 15-20 hours of my time, which
13 time I honestly could have spent with family, personal time, or work.

14 8. My understanding is that future tasks may require several more hours of my time.
15 Further, at all times I was ready, willing and able to testify at deposition and/or trial. I believe I have
16 been diligent and that I have acted above and beyond that of which is expected of a named plaintiff
17 to date and will continue to do so. To the best of my knowledge I have not conflicts of interest of any
18 kind with any other class member.

19 9. It is my opinion that \$2,500.00 is a fair and adequate award for my service as the
20 named plaintiff and light of the fact that I have separately resolved my individual claims and ongoing
21 arbitration with Defendant. I believe that amount is fair and reasonable in view of the work I have
22 and will continue to perform on behalf of the other aggrieved employees and the State of California.

23 10. I believe that my role as named plaintiff in this lawsuit has resulted in a valuable
24 benefit to the other aggrieved employees, and I accepted the potential risk of being liable for the
25 opposing parties' costs if we were unsuccessful in this lawsuit. I believed in this case, so I was willing
26 to be the named plaintiff and proposed class representative to risk this and pursue this class action
27 litigation. I also accepted the risk that news of this lawsuit could also potentially impact my ability to
28 secure other work.

11. Based on the time, service, risk, stress, potential stigma, loss of benefits and excellent outcome of this case, I believe the enhancement for me is fair and reasonable.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Executed on 09/30/2024, at Los Angeles, California.

Monet Sterling

Sterling L. Monet