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Attorneys for Plaintiff JELISA MARGARET SPRAGGINS on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN ALAMEDA

DEVONE M. BARNES, an individual and on behalf of all others similarly situated,

Plaintiff,

v.

BAY AREA COMMUNITY RESOURCES, INC., a California Nonprofit corporation; and DOES 1 through 100, inclusive,

Defendants.

CASE NO.: 24CV062496

[Assigned for all purposes to the Hon. Somnath Raj Chaterjee in Dept. 21]

DECLARATION OF JELISA MARGARET SPRAGGINS IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS AND REPRESENTATIVE ACTION SETTLEMENT AND PROVISIONAL CLASS CERTIFICATION FOR SETTLEMENT PURPOSES ONLY

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I, JELISA MARGARET SPRAGGINS hereby declare as follows:

1. I am over the age of eighteen and I submit this Declaration in support of the Plaintiffs' Motion for Preliminary Approval of Class and PAGA Action Settlement. The following is based upon my personal knowledge and if called as a witness, I could and would competently testify thereto.

2. I was employed by Defendant BAY AREA COMMUNITY RESOURCES ("Defendant") as a non-exempt employee with the position of Extended Learning Teacher in approximately November 2021 through my separation in approximately March 2024. My duties included but were not limited to lesson planning, teaching, and yard duty.

3. As a non-exempt employee, I suffered the same damages as other employees. These included not being paid all my wages including overtime, not provided meal and rest periods, not provided accurate wage statements, not reimbursed business expenses incurred, and not timely paid wages upon my separation from Defendants' employ all in accordance with California law. As a result of these alleged violations, I sought consultation with my attorneys at James Hawkins, APLC.

4. Based upon my allegations, and after consultation and full disclosure from my attorneys about the potential risks I faced as a Representative Plaintiff, I freely decided to pursue this lawsuit to try and vindicate my rights and the rights of others who also worked for Defendants and suffered similar harms due to Defendants' common practices and policies.

5. Prior to filing my action, my attorneys and I had multiple conferences about the factual bases for the claims that I wanted to pursue against Defendants. During those conferences, my attorneys provided me with an overview of how those claims would be litigated and generally educated me about the nature of complex/representative litigation and my role as the representative Plaintiff.

6. My attorneys provided me with a draft of the complaint for my review and approval. I closely reviewed the complaint to ensure accuracy and completeness. As a result, I caused my attorneys to file the class action complaint alleging claims for the allegations alleged therein. Thereafter, I have been fully involved in my case. Following the filing of the

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complaint, I collaborated with my attorneys on the prosecution of my claims, and I regularly contacted my attorneys to stay current on the status of the litigation, and to discuss my attorneys' progress in prosecuting the claims.

7. Since I believe I was not paid my wages, not timely paid wages, and therefore not provided accurate itemized wage statements, I believe that I have been similarly injured as to all other class members in the settlement who worked for Defendants during the class period. I believe the claims asserted in the Complaint are also shared by the other Class Members. I worked with various other non-exempt employees, and I believe we were all treated the same and subject to the same unlawful policies.

8. On November 12, 2024, I, through my attorneys, filed the putative class action against Defendant.

9. Since I agreed to become a Class Representative, I have worked every step of the way with my attorneys. During the course of the litigation I have always kept the best interest of the Class Members on equal footing as mine. I have been, and I am willing to continue to pursue the Class Members' claims vigorously on our collective behalf if the Settlement is not finally approved. As a result, I firmly believe that I do not have any interests adverse to the interests of the Class Members. I have maintained the Class Members best interest from the inception of the case.

10. As a Class Representative, I have spent numerous hours consulting with my attorneys, providing documentation, consulting with other Class Members, responding to questions by my attorneys, providing documents to my attorneys, working with my attorneys to review documents received, preparing for deposition although my deposition was never taken due to the settlement of this matter. I also assisted my attorneys in preparing for mediation and attending the mediations via telephone. I was consulted about the status of the case and provided constant feedback about the case from my attorneys including the mediation, settlement negotiations and eventual settlement. I estimate I have spent approximately 30-35 hours working on this case.

11. From the beginning of this case, I have freely chosen to accept the risks of

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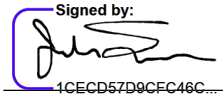
being a Class Representative in this class action lawsuit. I freely chose to assume the risks of filing a class action lawsuit and the stigma that is associated with it, to pursue the claims on behalf of the Class Members as I wanted to vindicate their rights. I believe we have achieved that result with the settlement and the individual payments to the Class Members. I believe the settlement is fair reasonable and adequate based on the numerous defenses asserted by Defendants. I believe the efforts and work I put forth helped to achieve the fair settlement that will benefit the Class Members. As a result of my efforts, I also believe the Class Representative Service Award is reasonable, and I respectfully request the Court approve the amount of $10,000.00 to each Plaintiff.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct. Executed on September 29, 2026, at Chicago, Illinois.

Signed by:



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JELISA MARGARET SPRAGGINS