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Attorneys for Plaintiff SHANNEN GARNER,

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

SHANNEN GARNER, on behalf of the general
public as private attorney general,

Plaintiff,

v.

STRATEGIC SECURITY SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No.: CIVSB2412063

Case No.: CIVSB2420009

**DECLARATION OF PLAINTIFF
SHANNEN GARNER IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PAGA SETTLEMENT**

DECLARATION OF SHANNEN GARNER

I, SHANNEN GARNER, declare as follows:

1. I am over the age of eighteen. The following is based upon my personal knowledge, and if called as a witness, I could and would competently testify regarding the statements in this Declaration

2. I was employed by Defendant Strategic Security Services, Inc. ("Defendant"), as a non-exempt employee in approximately 2020 with the title of Security Guard and Supervisor, and worked during the liability period for Defendants until Plaintiff's separation from Defendants' employ in approximately January 31, 2024. My duties included, but were not limited to providing security services for a marijuana cultivation facility in Victorville, California.

3. Prior to filing this lawsuit, I searched for an attorney and found James Hawkins, APLC. I never knew James Hawkins, APLC before my consultation with them. After my consultation, I asked them to represent me in bringing a Class Action against Defendant, as well as a representative PAGA action on behalf of myself and all other similarly situated non-exempt employees of Defendant.

4. I knew the alleged Labor Code violations complained of in the Complaints not only happened to me, but happened to the other employees of Defendant that I worked with. I wanted to help the other non-exempt workers vindicate their rights, so I agreed to represent all other similarly situated exempt and non-exempt employees who worked for Defendant in California, and to obtain relief for the Class Members and PAGA Members.

5. I believe my situation is similar and has been similar to all other non-exempt employees like me. I suffered the same damages as other employees, including: not being paid all wages, including overtime wages; not provided with valid meal and rest periods; not timely paid all wages earned and owed upon separation from Defendant's employ; not provided accurate itemized wage statements; not provided with business expenses reimbursements; and not provided a day of rest.

6. I believe that my interests have been and continue to be in alignment with the Class Members and PAGA Members, and I am willing to continue to pursue and prosecute their

1 representative claims against Defendant in this litigation. I believe I do not have any interests
2 which are against the interests of the Class Members or PAGA Members, and I will continue to
3 do what is best for all rather than myself, as I have done from the beginning of this case.

4 7. My relationship with James Hawkins, APLC is purely an attorney client
5 relationship and there are no other business, familial or social relationships between my attorney
6 and myself. In addition, I do not have any relationship with Defendant other than being a former
7 employee of theirs. For these reasons, there is no conflict of interest between myself, my
8 attorney, between Defendant, and myself or between the PAGA Members, Class Members, and
9 myself.

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

17 9. As the PAGA Representatives in this case, I participated in every aspect of the
18 litigation and have been apprised of its progress. I believe I have maintained the best interests of
19 the PAGA Members while performing my PAGA Representative duties. I have participated in
20 many interviews and conferences with my counsel regarding the conduct and settlement of this
21 matter.

22 10. My counsel has informed me that this information, along with the details and
23 support I provided for the claims alleged in this matter, were very important in convincing
24 Defendant to negotiate the settlement now before the Court for approval. I have also provided
25 many documents to my counsel in support of my claims, have helped my attorneys with preparing
26 written questions and what documents to ask for, and I have invested a lot of time and effort in
27 performing my duties on behalf of the PAGA Members. I also conducted numerous meetings
28 with my counsel to prepare for and discuss Defendant's information requests relating to discovery

1 and in advance of the mediation. I also participated in an all-day mediation of my case and was
2 readily available to answer the questions that came up.

3 11. After reviewing the settlement agreement and speaking with my counsel about it,
4 I agreed that I will sign it on behalf of myself and all the other Class Members and PAGA
5 Members. I signed the Settlement Agreement because I believe the Settlement obtained in this
6 case on behalf of the Class Members and PAGA Members is very fair, sufficient, and reasonable
7 in view of the facts I know and have been made aware of, and due to the risk of going through
8 further litigation. I believe the average payouts for the Class Members and PAGA Members are
9 very reasonable considering all the facts and evidence and risks moving the case forward to trial.

10 12. I also understand and believe to be fair the settlement allocation formula and
11 believe it fairly accounts for the individual settlement payments based on the strengths and
12 weaknesses of the various alleged claims and also considering the individual compensation and
13 pay rates for the various class members over the settlement period.

14 13. I also understand my counsel will request that I be awarded an Enhancement
15 Service Award Payment of \$6,500.00 for my efforts as a Class and PAGA Representative, and
16 that this additional payment is not guaranteed, but must be approved by the Court. I believe the
17 requested Service Award Payment is fair and reasonable based upon the results we have achieved
18 for the Class Members and PAGA Members and because of the tasks I have performed on their
19 behalf, including:

- 20 • Compilation of many documents for my attorneys;
- 21 • Review of many documents with my attorneys;
- 22 • Conducting preparation with my attorneys and participating in responding to
- 23 information for mediation and to informal discovery requests;
- 24 • Many telephone conferences with my attorneys and their representatives;
- 25 • Participation in the full-day mediation and in the approval settlement process;

26 14. I estimate that I have spent approximately 40 hours helping to prosecute this
27 matter.

16. I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Executed on this 21 day of April 2026 at Victorville, California.

DocuSigned by:

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SHANNEN GARNER