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Attorneys for Plaintiffs

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

ELIZA SERRANO, individually, and on
behalf of other members of the general
public similarly situated; CLAIRE SENEY,
individually, and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiffs,

vs.

DAISO USA, LLC, an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No. RG20074999

Honorable Michael Markman
Department 23

CLASS ACTION

**DECLARATION OF PLAINTIFF CLAIRE
SENEY IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Reservation ID: 705148965911
Date: August 5, 2025
Time: 10:00 a.m.
Department: 23

Complaint Filed: September 22, 2020
FAC Filed: April 15, 2025
Trial Date: None Set

DECLARATION OF CLAIRE SENEY

I, **Claire Seney**, 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 was employed by Daiso USA, LLC (previously named Daiso California LLC) (“Defendant”) from approximately February 2020 to approximately September 2022 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers for Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers for Justice, PC discussing my situation, complex representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff and a PAGA representative. Prior to joining the case, I was informed of and came to understand what my duties and responsibilities would be as a PAGA representative.

3. Throughout the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid or non-exempt aggrieved employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. Throughout this matter, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent time speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing

1 policies, practices, and procedures of Defendant.

2 5. As far as the settlement is concerned, I was available to review documents and
3 answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the
4 Settlement Agreement and discussed the questions I had regarding the potential settlement with
5 my attorneys before signing the settlement papers.

6 6. I understand that a settlement has been reached in my case and what my duties and
7 responsibilities are as PAGA representative. I also understand the significance of the type of relief
8 (civil penalties) available under the Private Attorneys General Act, California Labor Code section
9 2698, *et seq.* (“PAGA”), and my role as an agent and representative of the State of California with
10 respect to aggrieved employees, in connection with the claim seeking to recover civil penalties
11 that I am pursuing by way of this action under PAGA.

12 7. I believe that I have done everything that my attorneys have asked of me and have
13 tried, to the best of my ability, to seek relief for the aggrieved employees and the State of California
14 with respect to aggrieved employees. I have volunteered to represent and champion the interests
15 of many other people with similar claims and injuries because of the importance of the case and
16 the necessity that all aggrieved employees benefit from the lawsuit equally. I have participated,
17 and continue to participate, in the lawsuit as necessary. I have actively followed and monitored the
18 progress of the lawsuit, and have taken steps to make sure that the litigation is prosecuted by the
19 skilled and effective attorneys that I have retained.

20 8. I think my efforts helped to get the result obtained in this matter, and as a potential
21 PAGA representative, I respectfully request that the Court award me a service award for my efforts
22 in pursuing and participating in this matter, as well as my broader release of claims. Taking into
23 consideration the time that I have dedicated to this matter, I believe that this amount is reasonable.

24 9. I am not related to anyone associated with Lawyers *for* Justice, PC.

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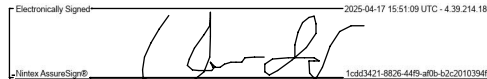
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1 10. I have not entered into any undisclosed agreements, nor have I received any
2 undisclosed compensation in this matter. The only compensation I will receive is whatever amount
3 the Court awards as a service award, as well as my share of the settlement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

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

7 Executed this 17th day of February 2025, at Orange, California

8 Electronically Signed - 2025-04-17 15:51:09 UTC - 4.39.214.186
9 Nitrox AssureSign® 1cd53421-8826-44f9-a0b-b2c2010394f7

10 Claire Seney