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8 Attorneys for Plaintiffs Andres Sendis and Telese  
Walker, individually, on behalf of themselves, and  
9 all others similarly situated

10 [Additional Counsel on Next Page]

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **FOR THE COUNTY OF RIVERSIDE**

13 ANDRES SENDIS and TELESE WALKER,  
14 individually, and on behalf of all others  
similarly situated,

15 Plaintiffs,

16 v.

17  
18 GUCCI AMERICA, INC., a corporation;  
KERING AMERICAS, INC., a corporation; and  
19 DOES 1 through 10, inclusive,

20 Defendants.  
21  
22  
23  
24

Case No.: CVPS2404656  
Consolidated with Case Nos. CVRI2401710  
and CVRI2407345  
Assigned to: Hon. Harold W. Hopp, Dept. 1

Complaint Filed: March 29, 2024  
FAC Filed: November 17, 2025  
Trial Date: Not set

**CLASS & REPRESENTATIVE ACTION**  
**DECLARATION OF PLAINTIFF TELESE WALKER IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT AND MOTION FOR ATTORNEYS' FEES, COSTS AND CLASS REPRESENTATIVE ENHANCEMENT AWARDS**

**FINAL APPROVAL HEARING**

Date: May 8, 2026  
Time: 8:30 a.m.  
Dept.: 1

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7 Attorneys for Plaintiffs Andres Sendis and Telese  
Walker, individually, on behalf of themselves, and  
8 all others similarly situated

1 I, Telese Walker, declare as follows:

2 1. I am an individual over the age of 18 years old. I am a named Plaintiff and proposed  
3 Class Representative in this action. I have personal knowledge of all the facts in this declaration  
4 and, if asked, I would testify to these facts under oath in court.

5 2. I submit this declaration in support of the Motion for Final Approval of the Class  
6 Action and PAGA Settlement and in support of the requested Class Representative Enhancement  
7 Award.

8 3. From February 9, 2009, to May 8, 2024, I worked for Defendants Gucci America,  
9 Inc. and Kering Americas, Inc. (collectively, "Defendants") at 48650 Seminole Dr Suite 228,  
10 Cabazon, CA 92230 as a non-exempt employee.

11 4. Because I thought that some of the practices of Defendants were unlawful, I decided  
12 to seek legal advice about my work experiences and about filing a lawsuit to obtain relief for my  
13 grievances. After speaking with my attorneys about my experiences working for Defendant, class  
14 actions, PAGA, and what it meant to bring a class action and PAGA action, and what it meant be  
15 a representative for the class, aggrieved employees, and the state of California, I decided to proceed  
16 with a lawsuit against my former employer. I also agreed to represent all persons employed by  
17 Defendants in California and classified as non-exempt employees during the Class Period and  
18 PAGA Period, and to obtain relief for the entire class and group of aggrieved employees. With my  
19 attorneys' assistance, I filed a class action action against the Defendant.

20 5. I retained my attorneys who are experienced in both class action and representative  
21 action litigation and claims against employers for violations of the California Labor Code. I have  
22 no personal relationship or family ties to my attorneys or any officer of the Court. I am not aware  
23 of having any actual or potential conflicts of interest with another class member in this case nor  
24 am I aware of having any actual or potential conflicts of interest with ILYM Grup Inc., the  
25 settlement administrator.

26 6. When I agreed to represent other similarly situated prospective, current, and former  
27 employees, I understood it was my duty to be readily available and to actively participate in the  
28 case. I knew that I needed to keep aware of the status and progress of the lawsuit. At all times, I

1 worked to fulfill these duties on behalf of other employees similarly situated, and I continue to do  
2 so through the settlement process.

3 7. I also understood the risks I could face due to my involvement as a named plaintiff.  
4 I understood that if I did not prevail in the litigation, I could be held responsible for the payment  
5 of Defendants' court awarded litigation costs and potentially attorneys' fees. Therefore, I realized  
6 that I was taking a significant amount of risk in filing the lawsuit.

7 8. I also knew that my name could easily be located on a search of court records and  
8 that any prospective employer or member of the public may find out that I had sued my former  
9 employer. I put my reputation at risk by attaching my name to this employment lawsuit against  
10 Gucci. Particularly in today's internet age, prospective employers can easily discover that I filed  
11 this lawsuit, which may jeopardize my ability to obtain future employment.

12 9. I also assumed the risk that the settlement might not be approved by the Court, in  
13 which case I would need to continue litigating the case with all the associated time, expense, and  
14 uncertainty.

15 10. Even though I knew I was taking risks, I knew I had to do what I believed was right  
16 and pursue claims on behalf of other employees to vindicate our rights and attempt to recover the  
17 wages owed to us. I am proud to know that I played a role in ensuring that Class Members are  
18 provided monetary relief as a result of the filing of this lawsuit.

19 11. Since initiating my lawsuit against Gucci America, Inc. and Kering Americas, Inc.  
20 in December 2024, I have actively participated in prosecuting this case on behalf of myself and  
21 the Class Members. Because I was employed with Defendant for several years during the class  
22 period, I was able to offer a wealth of information and experiences about Defendant's policies and  
23 practices.

24 12. In preparing for, and during, this litigation, I have spent numerous hours devoted  
25 to assisting with this case. I have been on numerous telephone calls discussing the facts of my case  
26 with the attorneys and staff of James Hawkins APLC, and spent significant time discussing the  
27 facts related to my employment with Defendant with my attorneys, including discussing my job  
28 duties and responsibilities, and the hours and days that I worked. I also spent time looking through

1 files for all documents related to my employment which included wage statement, policy  
2 documents, and time records. I further spent time on telephone calls discussing these documents.  
3 I have also spent additional time assisting with the settlement, negotiations, and the reviewing of  
4 settlement documents. I have also prepared and reviewed various declarations in support of the  
5 proceedings. I estimate that since I filed this lawsuit in December 30, 2024, I have spent at least  
6 25 hours involved in the litigation and resolution of this matter.

7 13. My attorneys forwarded me copies of the PAGA letter, PAGA complaint, class  
8 complaint, and amended complaint for review in this case. I thoroughly reviewed these documents  
9 and discussed the contents with my attorneys. My attorneys also provided me with a copy of the  
10 proposed Settlement which I reviewed carefully before signing it.

11 14. It is my opinion that the proposed settlement achieved is fair, adequate and  
12 reasonable.

13 15. I understand that approximately 35 current and former employees of Defendant will  
14 now receive cash payments they may not otherwise have recovered but for the initiation of this  
15 case. I understand that no objections have been received and no class members have requested  
16 exclusion from the Settlement. I believe that this excellent result confirms that the settlement fair  
17 and reasonable.

18 16. To date, I have not received any benefits as a result of prosecution of the action.

19 17. I understand that as a Participating Class Member, I will receive an Individual  
20 Settlement Payment based on my proportionate share of eligible workweeks worked during the  
21 Class Settlement Period.

22 18. Based on the settlement formula, my individual class payment has been calculated  
23 based on my eligible workweeks compared to the total workweeks worked by all Participating  
24 Class Members and has been estimated to be \$1,676.63. The estimated average individual class  
25 payment is \$1,528.02.

26 19. As a PAGA Member, I will also receive an Individual PAGA Payment based on  
27 my proportionate share of eligible pay periods worked during the PAGA Settlement Period. This  
28 payment will be my pro rata share of \$25,000 based on my workweeks during the PAGA Period,

1 and is estimated to be \$32.44. The estimated average individual PAGA payment is \$40.98.

2       20. In addition to my Individual Settlement Payment and Individual PAGA Payment  
3 as a Class Member, I am requesting a Class Representative Enhancement Award of \$10,000 in  
4 recognition of my efforts, time, and the significant risks I undertook in serving as a named Class  
5 Representative. I believe this amount is reasonable considering the amount of work and time I  
6 spent with my attorneys to achieve this excellent settlement over one year since I brought this  
7 lawsuit. The time and service I provided to the Class resulted in the parties ultimately agreeing to  
8 settle the case and in a positive outcome for the entire Class, who will receive a share of the  
9 settlement funds in this case.

10       21. As part of the Settlement I agreed to a general release of any claims I might have  
11 against Defendant. I understand that no other Class Members had to enter into a general release.  
12 I believe that this general release provides additional consideration for the Enhancement Award.

13       22. I further believe the amount of the Class Representative Enhancement Award is  
14 very reasonable considering the financial and professional risks I took by bringing a class action  
15 lawsuit against my former employer, including the potential of paying court-awarded litigation  
16 costs to Defendant, the negative exposure to future employers, and the potential loss of privacy  
17 that comes with having my name associated with this lawsuit and being part of the public record.

18       23. I believe the Class Members, who might not have been aware of their rights if not  
19 for this class action, will substantially benefit by resolution of their claims against Defendant for  
20 the Gross Settlement Amount of \$310,000.

21       24. As the appointed Class Representative, I remain committed to this case and will  
22 continue to participate as needed in the final approval and the settlement administration process.

23  
24 I declare under penalty of perjury under the laws of the State of California that the  
25 foregoing is true and correct. Executed on 04/10/2026 in Riverside County, California.

26  
27   
28 /s/ Telese Walker (Apr 10, 2026 11:52:13 PDT)  
Telese Walker