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12 Attorneys for CANDACE TURNER,
13 Individually, and on behalf of all others
similarly situated

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 COUNTY OF LOS ANGELES
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17 KUPER BANK and CANDACE TURNER,
18 individuals, and on behalf of the State of
19 California, as private attorneys general,

20 Plaintiffs,

21 v.

22 PARADIES SHOPS, LLC, a Limited Liability
23 Company; TASTE, INC., a Corporation; and
DOES 1 through 50, inclusive,

24 Defendants.
25
26

CASE NO.: 24TRCV02360

**DECLARATION OF CANDACE TURNER
IN SUPPORT OF MOTION TO APPROVE
PAGA SETTLEMENT**

Hearing Date: March 4, 2026
Hearing Time: 8:30 a.m.

Judge: Hon. David K. Reinert
Dept: P

Date Filed: July 15, 2024
Trial Date: Not set

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28 DECLARATION OF CANDACE TURNER IN SUPPORT OF MOTION TO APPROVE PAGA
SETTLEMENT

I, Candace Turner, declare as follows:

1. I am a competent adult, I have personal knowledge of the facts in this declaration, and I am making this declaration on behalf of myself, as a named plaintiff, and in support of the Motion to Approve Private Attorneys General Act Settlement.

2. I worked in California as a non-exempt employee of Defendants Paradies Shops, LLC, Taste, Inc., Paradies Lagardere @ SMF (F&B), LLC and Paradies Lagardere @ SMF, LLC (“Defendants”) from approximately February of 2022 to August of 2022.

3. I retained my attorneys who are experienced in PAGA representative action litigation and claims against employers for violations of the California Labor Code. I have no personal relationship or family ties to my attorneys or any officer of the Court. I am not aware of having any actual or potential conflicts of interest with another class member in this case nor am I aware of having any actual or potential conflicts of interest with Apex Class Action LLC, the settlement administrator.

4. I was subject to Defendants’ policies and practices that have been alleged as unlawful in the Complaint and the PAGA notice sent to the Labor and Workforce Development Agency. For example, I was required to work off the clock for Defendants both before and after my shifts, and on my days off.

5. In bringing this case for myself, the State of California, and the other employees, I understood a lot of work would be required, and I was willing to—and did do—the work to keep the case moving forward. For instance, before the complaint was filed, I spoke to my attorneys several times and discussed how Defendants implemented their company policies and procedures. I also assisted my attorneys in their investigation into my claims by providing them with documents and answering their questions. I reviewed the complaint before it was filed, and after it was filed, I received and reviewed important documents that were filed to keep up with the developments in the case. My attorneys informed me that Defendants had the right to take my deposition, and that the preparation and deposition itself could take substantial time. My attorneys also informed me that the case could go to trial, where I would testify about my experiences.

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Although my deposition was not taken and although the case did not require a trial, I feel I would have been adequately prepared and comfortable to give testimony on my experiences.

6. My attorneys explained to me the risks and benefits of bringing a representative action. I understood that I took on the risk, both professionally and financially, in pursuing the case as a representative PAGA action.

7. A mediation took place on May 6, 2025, with Tagore Subramaniam, Esq., a well-respected and experienced mediator. The mediation resulted in an agreement to settle the action. I communicated with my attorneys regarding the terms of the settlement that was reached between the parties and understood that the recovery in this case was for the benefit of my fellow coworkers, not just for me, and therefore wanted the best possible result to be obtained for the aggrieved employees. I reviewed and signed the Memorandum of Understanding on May 29, 2025.

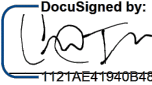
8. I have been actively involved with this lawsuit. Although I did not keep time records, I was in regular contact with my attorneys, reviewed court filings, and spent a significant amount of time on the issues presented during the lawsuit and in the settlement process. I estimate that I spent over 30 hours working on this case up until this point.

9. I reviewed the final PAGA Settlement Agreement, and I believe it is fair and reasonable given the facts of the case.

10. I believe the \$10,000 Service Award I have requested is fair compensation for my efforts in support of this action and the risks I undertook.

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

Executed on 2/3/2026, at Calaveras, California.

DocuSigned by:

 1121AE41940B481...
 Candace Turner

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