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11 Attorneys for Plaintiffs

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF LOS ANGELES

14 KUPER BANK and CANDANCE TURNER,
15 individuals, and on behalf of the State of
16 California, as a private attorney general,

17 Plaintiff,

18 v.

19 PARADIES SHOPS, LLC, a Limited Liability
20 Company; TASTE, INC., a Corporation; and
21 DOES 1 through 50, inclusive,

22 Defendants.

CASE NO.: 24TRCV02360

**DECLARATION OF KUPER BANK IN
SUPPORT OF MOTION TO APPROVE
PAGA SETTLEMENT**

Hearing Date: February 25, 2026

Hearing Time: 8:30 am

Judge: Hon. David K. Reinert

Dept: P

Date Filed: July 15, 2024

Trial Date: Not set

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28 DECLARATION OF KUPER BANK IN SUPPORT OF MOTION TO APPROVE PAGA
SETTLEMENT

1 I, Kuper Bank, declare as follows:

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

5 2. I worked in California as a non-exempt employee of Defendant Paradies Shops, LLC
6 (“Defendant”) from March of 2023 to March of 2024.

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

13 4. I was subject to Defendant’s policies and practices that have been alleged as unlawful in
14 the Complaint and the PAGA notice sent to the Labor and Workforce Development Agency. For
15 example, I was required to work off the clock for Defendant both before and after my shifts, and
16 on my days off. In addition, Defendant failed to reimburse me for the use of my personal cell
17 phone for work-related purposes.

18 5. In bringing this case for myself, the State of California, and the other employees, I
19 understood a lot of work would be required and I was willing to, and did, do the work to keep the
20 case moving forward. For instance, before the complaint was filed I spoke to my attorneys several
21 times and discussed how Defendant implemented its company policies and procedures. I also
22 assisted my attorneys in their investigation into my claims by providing them documents and
23 answering their questions. I reviewed the complaint before it was filed and after it was filed I was
24 given access to an electronic file sharing program that alerted me via email when important
25 documents were filed so that I could review them and keep up with the developments in the case. I
26 was informed that the Defendant had the right to take my deposition, and that the preparation and
27 deposition itself could take multiple days. Although my deposition was not taken, I feel I would

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DECLARATION OF KUPER BANK IN SUPPORT OF MOTION TO APPROVE PAGA
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1 have been adequately prepared and comfortable to give testimony on my experiences.

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

5 7. A mediation took place on May 6, 2025, with Tagore Subramaniam, Esq., a well-respected
6 and experienced mediator. The mediation resulted in an agreement to settle the action. I
7 communicated with my attorneys regarding the terms of the settlement which was reached
8 between the parties and understood that the recovery in this case was for the benefit of my fellow
9 coworkers, not just for me, and therefore wanted the best possible result to be obtained for the
10 aggrieved employees. I reviewed and signed the Memorandum of Understanding on June 12,
11 2025.

12 8. I have been actively involved with this lawsuit. Although I did not keep time records, I
13 was in regular contact with my attorneys, reviewed court filings, and spent a significant amount of
14 time on the issues presented during the lawsuit and in the settlement process. I estimate that I
15 spent approximately 30-40 hours working on this case up until this point.

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

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

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DECLARATION OF KUPER BANK IN SUPPORT OF MOTION TO APPROVE PAGA
SETTLEMENT

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

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4 Executed on 01 / 26 / 2026, at Cathedral City, CA.
5 (city, state)

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Kuper Bank

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