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Attorneys for Plaintiff,
KIERRE J. TOWNSEND

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

KIERRE J. TOWNSEND, on behalf of
herself, all others similarly situated,

Plaintiff,

vs.

G2 SECURE STAFF, L.L.C., a Texas limited
liability company; G2 SECURE STAFF CA,
L.P., a Texas limited partnership; and DOES
1 through 50, inclusive,

Defendants.

Case No. 18STCV04429

**DECLARATION OF KIERRE
TOWNSEND IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: July 7, 2020
Time: 11:00 a.m.
Place: Department 10
Judge: William Highberger

DECLARATION OF KIERRE TOWNSEND

I, Kierre Townsend, declare and state as follows:

1. The following facts are stated from my personal knowledge, except those facts stated on information and belief, which I believe to be true and correct, and if called as a witness, I could and would testify competently thereto under oath.

2. I am the named plaintiff and class representative in this action against Defendants G2 SECURE STAFF, L.L.C. and G2 SECURE STAFF CA, L.P. (“G2” or “Defendants”).

3. I understand that, as a class representative, I have certain duties and responsibilities to the class, and I believe that I have fairly represented the interests of all class members during the entire course of this action.

4. I worked for Defendants in an hourly position in the State of California during the relevant Class Period.

5. I have considered the interests of the Settlement Class as I would consider my own interests, have put the interests of the Settlement Class before my own interests by retaining experienced counsel and carefully considering the impact that the Settlement in this case would have on them, and I understand that the Settlement in this case is subject to this Court’s approval to ensure that it is in the best interest of the class as a whole.

6. I have spent a considerable amount of time on this case. The activities I have spent this time on include, but is not limited to: (1) retaining experienced counsel, (2) providing them with extensive experience about my work history with Defendants and Defendants’ policies and practices, (3) being deposed; (4) assisting my counsel in preparing for a mediation session, (5) attending the mediation, and (6) time spent being actively involved in the settlement process to ensure a fair result for the Settlement Class as a whole.

7. I understand that my attorneys are submitting an application to this Court for an enhancement award to compensate me for my unique contribution to the success of this action in the amount of \$7,500. I believe this amount is fair and reasonable compensation for my efforts in this case and the risks I have taken in pursuing a fair recovery for the Settlement Class. There is now a public record that I served as a class representative in a case against my employer. By filing

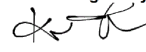
1 this case I became potentially responsible for paying Defendants' costs.

2 I declare under the penalty of perjury under the laws of the State of California that the
3 foregoing is true and correct to the best of my knowledge.

4 Executed on 6/2/2020 in Los Angeles, California.

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KIERRE TOWNSEND

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PROOF OF SERVICE

I am a citizen of the United States and am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 315 South Beverly Drive, Suite 315 Beverly Hills, CA 90212.

On June 5, 2020, I served the foregoing documents described as:

**DECLARATION OF KIERRE TOWNSEND IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

in this action by transmitting a true copy thereof enclosed in a sealed envelope addressed as follows:

Robert Jon Hendricks
Rj.hendricks@morganlewis.com
Kathy H. Gao
Kathy.gao@morganlewis.com
Linda Shen
MORGAN, LEWIS & BOCKIUS LLP
300 South Grand Avenue, 22nd Floor
Los Angeles, California 90071

(VIA CASE ANYWHERE)

A true and correct copy of said document was sent to the parties listed on the Electronic Service List maintained by Case Anywhere in the manner set forth in the Court's Order Authorizing Electronic Service.

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

Executed on June 5, 2020 at Beverly Hills, California.



Lauren Farrington