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KIERRE J. TOWNSEND

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF LOS ANGELES**

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

12 *Plaintiff,*

13
14 vs.

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

17 *Defendants.*

Case No. 18STCV04429

**DECLARATION OF FARRAH GRANT
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND FOR AN AWARD
OF ATTORNEYS' FEES AND COSTS**

Hearing Information


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

DECLARATION OF FARRAH GRANT

I, FARRAH GRANT, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California, and an attorney of record for Plaintiff Kierre Townsend (“Plaintiff”) in her action against Defendants G2 SECURE STAFF, L.L.C. and G2 SECURE STAFF CA, L.P. (“G2” or “Defendants”). Except for those matters stated on information and belief, which I am informed and believe to be true and correct, I have personal knowledge of all matters set forth herein. If called as a witness, I could and would competently testify thereto under oath.
2. I graduated from UCLA in 2010 and UCLA School of Law in 2013. While Attending UCLA School of Law, I was chair of the El Centro Workers’ Rights Clinic and worked as a judicial extern in the Central District of California. After graduating from law school, I clerked at the U.S. Equal Employment Opportunity Commission.
3. Since February 2014, I have worked on plaintiff side class action employment cases, including Fair Credit Reporting Act cases and wrongful termination cases. I have significant litigation experience, including defending depositions, drafting oppositions to motions to dismiss and for summary judgment and drafting motions for class certification.
4. The Laffey Matrix provides that for attorneys of 4 to 7 years of experience an hourly rate of \$458 an hour is appropriate. Therefore, my \$450 rate is slightly lower than the recommended Laffey Matrix rate.
5. I have been involved in this case since it was filed. Work I have performed on this case includes communicating with Plaintiff, outside counsel, in the firm internally, the settlement administrator, reviewing documents and data produced by Defendants, reviewing the settlement documents, drafting the motion for preliminary approval and the motion for final approval and supporting papers.

I declare under the penalty of perjury of the laws of California that the foregoing is true and correct to the best of my knowledge. Executed June 4, 2020 at Newbury Park, California.

DocuSigned by:

 BECC88560 Farrah Grant
 Declarant

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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 FARRAH GRANT IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND FOR AN AWARD OF ATTORNEYS' FEES AND COSTS

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