THE WAND LAW FIRM, P.C. 1 **SCHNEIDER WALLACE** Aubry Wand (SBN 281207) COTTRELL KONECKY LLP Todd M. Schneider (SBN 158253) 100 Oceangate, Suite 1200 Peter B. Schneider (Admitted Pro Hac Vice) Long Beach, CA 90802 3 Jason H. Kim (SBN 220279) Telephone: (310) 590-4503 2000 Powell Street, Suite 1400 Email: awand@wandlawfirm.com 5 Emeryville, CA 94608 Telephone: (415) 421-7100 Email: tschneider@schneiderwallace.com 7 pschneider@schneiderwallace.com jkim@schneiderwallace.com 8 Attorneys for Plaintiffs and the Class 9 10 UNITED STATES DISTRICT COURT 11 CENTRAL DISTRICT OF CALIFORNIA 12 WESTERN DIVISION 13 14 KIMBERLY BANKS and CAROL CASE NO.: 2:20-cv-06208-DDP CANTWELL, on behalf of themselves (RAOx)15 and all others similarly situated, DECLARATION OF KIMBERLY BANKS 16 Plaintiffs, 17 v. 18 R.C. BIGELOW, INC., a corporation; and DOES 1 through 10, inclusive, 19 Defendants. 20 21 22 23 24 25 26 27 28

DECLARATION OF KIMBERLY BANKS

- 1. I am one of the Plaintiffs in the above-captioned case. I have personal knowledge of the facts set forth in this declaration and I could and would readily and competently testify under oath if called as a witness.
- 2. I understand that this declaration will be used in support of Plaintiffs' Motion for Attorneys' Fees and Costs and Service Awards.
- 3. I respectfully request that the Court approve a class representative service award of \$30,000. I believe that this is reasonable based on the time and effort that I have expended, my willingness to place myself at risk for the sake of the other Class Members, and for the integral role that I played in obtaining a verdict for the Class.
- 4. Over the five years that this case has been pending, I have been in regular communication with my attorneys and have actively taken steps to litigate this case on behalf of the Class. I have also been involved in major strategic decisions in this case. All the actions that I have taken were made in the best interest of the Class.
- 5. Among other things, I have had dozens of communications with my attorneys, reviewed pleadings, assisted counsel in the preparation of pleadings such as the complaints, participated in settlement discussions, reviewed and responded to several sets of written discovery, did an extensive search for and produced documents, prepared for and sat for deposition, and prepared for and testified at trial. I took several days off from work to attend my deposition and trial.
- 6. The time that I devoted to this case can roughly be broken down into the following categories:

Category	Time
Attorney Communications	14.00
Document Production	3.00

Document Review	7.50
Written Discovery	16.00
Travel	7.00
Preparing for and Sitting for Deposition	12.00
Preparing for and Attending Trial	62.00
Total	121.50

- 7. I have devoted approximately 121.50 hours of my time to this case.
- 8. In making the decision to bring this case, I understood that my name would be a part of the public record in connection with this lawsuit. I did not necessarily want my name to be in the public domain in this context. I also knew there was a risk that I could be liable for costs if I lost the case. I decided to proceed with this case nonetheless because I wanted to stand up for the rights of other consumers, in addition to my own.

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

Executed on _____ at Los Angeles, California.

kimberly Banks
Kimberly Banks