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Attorneys for Plaintiffs and the Class

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

KIMBERLY BANKS and CAROL
CANTWELL, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

R.C. BIGELOW, INC., a corporation;
and DOES 1 through 10, inclusive,

Defendants.

CASE NO.: 2:20-cv-06208-DDP
(RAOx)

**DECLARATION OF CAROL
CANTWELL**

DECLARATION OF CAROL CANTWELL

1
2 1. I am one of the Plaintiffs in the above-captioned case. I have personal
3 knowledge of the facts set forth in this declaration and I could and would readily
4 and competently testify under oath if called as a witness.

5 2. I understand that this declaration will be used in support of Plaintiffs'
6 Motion for Attorneys' Fees and Costs and Service Awards.

7 3. I believe that this action, and the verdict for the Class, would not have
8 been possible without my active participation and my willingness to place myself at
9 risk for the sake of the other Class Members. Therefore, I respectfully request that
10 the Court approve a class representative service award of \$30,000.

11 4. Over the five years that this case has been pending, I have been in
12 regular communication with my attorneys, and I have actively taken steps to litigate
13 this case on behalf of the Class. Among other things, I have had dozens of
14 communications with my attorneys, reviewed pleadings, assisted counsel in the
15 preparation of pleadings such as the complaints, participated in settlement
16 discussions, reviewed and responded to several sets of written discovery, did an
17 extensive search for and produced documents, prepared for and sat for deposition,
18 and prepared for and testified at trial. I was also actively involved in major strategic
19 decisions in this case. All the actions that I took were made in the best interest of the
20 Class.

21 5. The time that I devoted to this case can roughly be broken down into
22 the following categories:

Category	Time
Attorney Communications	16.50
Document Production	4.50
Document Review	6.50
Written Discovery	15.00

Travel	8.00
Preparing for and Sitting for Deposition	12.25
Preparing for and Attending Trial	64.00
Total	126.75

6. I have devoted approximately 126.75 hours of my time to this case.

7. 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 despite these risks 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 4/20/2025 at San Diego, California.

DocuSigned by:

Carol Cantwell

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Carol Cantwell