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8

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF NEVADA**

11
12 CHER LEE FAACKS, individually and on
behalf of all similarly situated individuals.

13 Plaintiff,

14 v.

15 STORAGEPRO MANAGEMENT, INC., a
16 California corporation, and DOES 1
through 10, inclusive,

17 Defendants.
18

CASE NO: CU19-084121

Assigned to the Hon. S. Robert Tic-Raskin, Dept. 6

CLASS ACTION

**DECLARATION OF CHER LEE FAACKS IN
SUPPORT OF UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT AND SEEKING
LEAVE TO FILE SECOND AMENDED
COMPLAINT**

DATE: June 16, 2023

TIME: 10:00 a.m.

DEPT.: 6

Complaint Filed: September 13, 2019

ELECTRONICALLY
FILED
BY SUPERIOR COURT OF CALIFORNIA,
COUNTY OF NEVADA
06/06/2023
KIMBERLY FLENER, CLERK OF THE COURT
MELISSA MORGAN, DEPUTY

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I, CHER LEE FAACKS, hereby declare and state as follows:

1. I am the named Plaintiff in this lawsuit against Defendant Storagepro Management, Inc. (“Defendant”) and I submit this declaration in support of Plaintiff’s Unopposed Motion for Preliminary Approval of Class Action Settlement and Seeking Leave to File Second Amended Complaint. I am a competent adult and worked for Defendant as a non-exempt employee in Nevada County during the relevant time period. I have personal knowledge of the facts set forth herein, and if called as a witness to testify to them, I could and would do so competently.

2. I contacted my current attorneys when I questioned the employment practices of Defendant prior to commencing this lawsuit. I accepted the opportunity to act as a Class Representative in a class action on behalf of other employees of Defendant whom I believed were being subjected to labor law violations. Although presented with the opportunity, I did not pursue this case on an individual basis and instead did so as a class action so that I could help other employees recover for what I believed were Defendant’s illegal practices.

3. Specifically, I questioned Defendant’s policies of failing to pay all minimum and overtime wages, failing to provide meal and rest periods, failing to reimburse employees business expenses, and issuing its employees deficient wage statements. Through many discussions with my lawyers, I learned these may be illegal practices and Defendant’s employees might have recourse for them.

4. By bringing this lawsuit, and throughout its course, I have put the interests of the class ahead of my own. I understood that I could possibly earn a small enhancement payment if this case resolved itself favorably, but always knew that I could also be responsible for paying Defendant’s attorneys’ fees and costs if it did not. My goal in bringing this lawsuit was to obtain a recovery on behalf of the class, and even more importantly, to put an end to what I believed were illegal practices on the part of Defendant. I believe I have achieved both through this lawsuit and settlement.

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

Executed on May 15, 2023 at Sacramento, California.



CHER LEE FAACKS