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7 Attorneys for Plaintiff
AMELIA PERRYMAN
8

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 FOR THE COUNTY OF ALAMEDA
11

12 AMELIA PERRYMAN, on behalf of herself,
and all others similarly situated,

13 Plaintiff
14

15 v.

16 LUSH COSMETICS, LLC a Delaware limited
liability company; and DOES 1 through 50
inclusive,
17

Defendants
18

Case No. RG19008535

*Assigned for all purposes to the
Hon. Michael Markman*

**DECLARATION OF AMELIA
PERRYMAN IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: December 12, 2024

Time: 10:00 a.m.

Place: Department 23

Complaint Filed: February 27, 2019

1 I, AMELIA PERRYMAN, declare as follows:

2 1. I am a resident of the State of California and am over 18 years of age. The following
3 facts are stated from my personal knowledge, except those facts stated on information and belief,
4 which I believe to be true and correct, and if called as a witness, I could and would testify
5 competently thereto under oath. I am a named plaintiff and class representative in these coordinated
6 class actions against Lush Cosmetics.
7

8 2. I make this declaration in support of Plaintiff's Motion for Final Approval of Class
9 Action Settlement.

10 3. I worked for Defendant Lush beginning on or about September 2015 through
11 February 27, 2018 as a non-exempt hourly employee at Lush Cosmetics at Westfield Fashion Square
12 in Sherman Oaks, California.
13

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

17 5. My counsel provided me with information regarding class actions, how they work,
18 and what my duties would be as a class representative. I agreed to serve as a class representative in
19 this matter so that I could seek to recover damages and penalties on behalf of myself and others
20 similarly situated to me.
21

22 6. I understand that the Settlement in this case is subject to this Court's approval to
23 ensure that it is in the best interest of the class as a whole. I have no conflicts with the members of
24 the class.

25 7. As a class representative, I assumed a fiduciary role to the class. I agreed to: (1)
26 consider the interests of the class just as I would consider my own interests and, in some cases, to
27 put the interests of the class before my own interests; (2) actively participate in the lawsuit, as
28

1 necessary, by among other things, answering interrogatories, producing documents to Defendant,
2 and giving depositions and trial testimony, if requested; (3) travel to give such testimony; (4)
3 recognize and accept that any resolution of the lawsuit by dismissal or settlement is subject to court
4 approval and must be designed in the best interest of the class as a whole; (5) follow the progress of
5 the lawsuit and provide all relevant facts to my attorneys; (6) champion many other people with similar
6 claims and injuries because of the importance of the case and the necessity that all class members benefit
7 from the lawsuit; and (7) fight for a resolution in which the individual recoveries to each class member,
8 including me, maybe relatively small. I agreed to shoulder all of these responsibilities in exchange
9 for a proportionate share of funds made available for distribution to the class. I had no guarantee of
10 an enhancement award. I have spent at least 40 hours of my time in connection with this case to
11 date. The activities I have performed have included but have not been limited to: obtaining legal
12 counsel, speaking with my legal counsel on numerous occasions, assisting them in gathering
13 information, identifying the claims brought in this case, gathering documents from my employment
14 with Defendant, being deposed, assisting in preparing the motion for class certification, and taking
15 part in numerous conversations with my counsel concerning mediation and settlement. I have also
16 spent time carefully reviewing the Settlement, and other case-related documents on my own and
17 with my counsel to make sure that the Settlement and other work my attorneys performed are in the
18 best interest of the class.
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22 8. I understand Class Counsel are submitting an application to this Court for an
23 enhancement award to compensate me for my unique contributions to the success of this action in
24 the amount of \$10,000.00. This amount is only .55% of the total settlement amount of
25 \$1,800,000.00. I believe this amount is fair and reasonable compensation for my efforts in this case
26 and the risks I have taken in pursuing a fair recovery for the class.
27

28 9. Further, my counsel have advised me of the possibility that, if the case was lost, I

1 could have been ordered to pay Defendant's costs and even attorneys' fees in this case, which could
2 have been thousands of dollars by the end.

3 10. Because I filed a lawsuit, there is a public record at the Court showing that I brought
4 a class action lawsuit against my ex-employer. The payment to me of the enhancement award of
5 \$10,000.00 is not equal to the harm to my future career prospects that this case may cause me.
6

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

9 Executed on November ⁷____, 2024.

11 *Amelia Perryman*

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13 AMELIA PERRYMAN
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eSignature Details

Signer ID:	5xGvx2UdDR6oA1121jgC6tEU
Signed by:	Amelia Perryman
Sent to email:	ameliaperryman@gmail.com
IP Address:	107.119.53.114
Signed at:	Nov 7 2024, 8:36 pm PST