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10 Attorneys for Representative Plaintiffs

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 FOR THE COUNTY OF SAN FRANCISCO  
13 (UNLIMITED JURISDICTION)  
14

15 COORDINATION  
16 PROCEEDING SPECIAL TITLE  
[RULE 3.550]

} Case No: Judicial Counsel Coordinated  
Proceeding No. 4911

17 **SEPHORA WAGE AND HOUR  
18 CASES**

} [CLASS ACTION PURSUANT TO CODE  
OF CIVIL PROCEDURE §382]

19 Included actions:

} SUPPLEMENTAL DECLARATION OF  
BRENDA MORALES IN SUPPORT OF  
MOTION FOR FINAL APPROVAL OF  
SETTLEMENT

20 *Burnthorne-Martinez v. Sephora  
USA, Inc.*  
21 (San Francisco CGC 16-550894)

} Date: May 5, 2022  
Time: 9:00 a.m.  
Dept: 613

22 *Provencio v. Sephora USA, Inc.*  
(Santa Clara 16CV294112)

23 *Hernandez v. Sephora USA, Inc.*  
24 (San Francisco CGC-17-557031)

25 I, Brenda Morales declare as follows:

26 1. I am one of the Named Plaintiffs in the above-referenced matter. If called  
27 upon as a witness, I could and would competently testify competently and fully to  
28 the following facts based upon my personal knowledge or upon information and  
belief.

1 2. The Court asked me to provide additional information. To do that end, I make  
2 this *supplemental* declaration in support of Plaintiff’s Motions for Final Approval  
3 of Class Action Settlement and Fees, Costs and Service Awards (the “Motions”).

4 **Risks As Named Plaintiff**

5 3. As I declared previously, I understood the potential risk of being liable for the  
6 Defendant’s costs if we were unsuccessful in this lawsuit. As I previously  
7 declared, since about 2005 till just before this lawsuit, I worked at Sephora as a  
8 sales person. As a sales person, I never made more than several thousands of  
9 dollars. I lived close to Fresno, in a one-bedroom apartment. I drove an old car. I  
10 basically lived paycheck to paycheck without much in savings. I lived simply  
11 because that was all I could afford.

12 4. Any award against me for Sephora’s cost would be terrible. Regardless, I felt  
13 (and still feel) that it was worth the risk.

14 5. More than money, though was the impact that this lawsuit would have on my  
15 career in retail sales, which was all I had done before the suit.

16 6. As I declared, I had worked at Sephora since 2005 until 2016, just before the  
17 lawsuit. Up until the beginning of the lawsuit, my only adult job had been in retail  
18 makeup sales. This was all I knew.

19 7. I live in the Fresno area of the Central Valley. Everyone sort of knows  
20 everyone else, particularly in retail and most especially when it comes to make up  
21 sales, such as Sephora.

22 8. News travels fast in small towns.

23 9. I expected that most of the Sephora people that I had worked with would  
24 know that I was involved in the lawsuit against Sephora.

25 10. I thought that any potential managers in the area would know about my  
26 involvement and simply would not hire me. I expected that my career in retail  
27 sales was over.

28 11. In fact, I changed careers after leaving Sephora.

12. I am now in health care, and no longer in retail sales.

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1 **Time and Effort Expended on the Litigation**

2 13. The Court also asked that I estimate the time and effort expended on this  
3 lawsuit.

4 14. I have done my best to estimate my time by reconstructing my time by  
5 reviewing the numerous emails and correspondence with my attorneys, plus  
6 estimating my time for key events like my deposition, reviewing discovery, etc.

7 15. I reviewed my email account, and found that there were 85 different email  
8 exchanges with my attorneys. I estimate that I spent at least 21 hours reviewing  
9 and responding to these emails

10 16. I was also involved with the following:

- 11 a. Research underlying facts such as paycard use and handbook  
12 versions;
- 13 b. Three Sets of Interrogatories directed to me specifically;
  - 14 i. I initially provided information for the responses,
  - 15 ii. I then reviewed the actual responses, offered comments, and  
16 reviewed the final versions;
  - 17 iii. I signed the verifications.
- 18 c. Three Sets of Requests for Production directed to me;
  - 19 i. I initially reviewed my files for any relevant documents;
  - 20 ii. For each subsequent set of Requests, I would again review my  
21 files for any documents not previously provided;
  - 22 iii. I sent documents to my counsel both at the beginning and as the  
23 case went on,;
  - 24 iv. I then reviewed the responses, offered comments, and reviewed  
25 the final versions;
  - 26 v. I signed the verifications.
- 27 d. Four Sets of Interrogatories directed to Named Plaintiffs for each class  
28 and PAGA;
  - 29 i. Again, I initially provided information for the responses,
  - 30 ii. I then reviewed the actual responses, offered comments, and  
31 reviewed the final versions;
  - 32 iii. I signed the verifications.

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- e. Four Sets of Requests for Production directed to Named Plaintiffs for each class and PAGA;
  - i. I initially reviewed my files for any relevant documents;
  - ii. For each subsequent set of Requests, I would again review my files for any documents not previously provided;
  - iii. I then reviewed the responses, offered comments, and reviewed the final versions;
  - iv. I signed the verifications.
- f. My deposition;
  - i. As I declared above, I live in the Central Valley. I traveled from my home to Los Angeles for the deposition;
  - ii. The deposition took the day, after which I traveled back home.
  - iii. When the deposition transcript came in, I reviewed it over several days.
- g. Plaintiffs' Motion for Class Certification
  - i. I assisted my counsel in preparing my declaration;
  - ii. Once it was completed, I reviewed it and executed the declaration.
- h. Plaintiffs Motion for Summary Adjudication –
  - i. I assisted my counsel in preparing my declaration;
  - ii. Once it was completed, I reviewed it and executed the declaration.
- i. The Mediation – I was involved before and during the entire mediation, which lasted all day.
- j. The Motion for Preliminary Approval –
  - i. Similar to the Motion for Summary Adjudication, I assisted my counsel in preparing my declaration;
  - ii. Once it was completed, I reviewed it and executed the declaration.
- k. The Motion for Final Approval --
  - i. I assisted my counsel in preparing my first declaration;

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- ii. Once it was completed, I reviewed it and executed the declaration;
- iii. Subsequently, the Court asked for an estimate of my time in this litigation. For that, I went through all of my emails and all of the various work I had completed for this matter.
- iv. I assisted my counsel in preparing this supplemental declaration;
- v. Once it was completed, I reviewed it and executed the declaration.

17. I first contacted my attorney, John M. Norton in about July of 2016 and have worked with him to the present day. In the past six years, I reasonably estimate I have spent a total of about 90-95 hours on this matter.

18. Finally, my personal benefit or lack thereof – I understand that I will qualify for payout as a class member, so that is a benefit

19. On the other hand, I also don't have much contact with some of my friends who still work at Sephora. This last part has been hard at times. I was at Sephora for over 10 years. I had many friends but unfortunately this lawsuit and the years it has taken made some of my Sephora friends a bit shy.

I declare under penalty of perjury under the laws of the United States, that the above is true and correct to the best of my knowledge and was executed on May 2 2022 at Madera, California.



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Brenda Morales, Declarant