

1 Douglas Caiafa, Esq. (SBN 107747)  
DOUGLAS CAIAFA, A Professional Law Corporation  
2 11845 West Olympic Boulevard, Suite 1245  
Los Angeles, California 90064  
3 (310) 444-5240 - phone; (310) 312-8260 - fax  
Email: dcaiafa@caiafalaw.com

4 Christopher J. Morosoff, Esq. (SBN 200465)  
LAW OFFICE OF CHRISTOPHER J. MOROSOFF  
5 77-760 Country Club Drive, Suite G  
Palm Desert, California 92211  
6 (760) 469-5986 - phone; (760) 345-1581 - fax  
Email: cjmorosoff@morosofflaw.com

7 Greg K. Hafif, Esq. (SBN 149515)  
8 Michael G. Dawson, Esq. (SBN 150385)  
LAW OFFICE OF HERBERT HAFIF  
9 269 W. Bonita Avenue  
Claremont, California 91711  
10 (909) 624-1671 - phone; (909) 625-7772 - fax  
Email: ghafif@hafif.com

11  
12 Attorneys for Plaintiffs STACI CHESTER et al.

13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA  
15 EASTERN DIVISION  
16

17 STACI CHESTER, et al.,  
18 Plaintiffs,  
19 vs.  
20 TJX COMPANIES, INC., et al.,  
21 Defendants.  
22

**EDCV 15-01437 ODW (DTBx)**  
**DECLARATION OF ROBIN BERKOFF IN SUPPORT OF MOTION FOR ATTORNEYS' FEES AND COSTS; COSTS OF ADMINISTRATION AND CLASS REPRESENTATIVES' ENHANCEMENT PAYMENTS FOR CLASS CERTIFICATION**

Courtroom: 5D – First Street  
Date: May 14, 2017  
Time: 1:30 p.m.  
Judge: Hon. Otis D. Wright, II

**DECLARATION OF ROBIN BERKOFF**

I, Robin Berkoff, declare as follows:

1. I am a named Plaintiff in the matter pending before this court, *Staci Chester et al. v. TJX Companies, Inc. et al.*, U.S.D.C. Central District, Case No. 5:15-cv-01437-ODW (DTBx).
2. I am familiar with the facts set forth below and can and will competently testify thereto if called upon to do so.
3. I submit this Declaration in support of Plaintiffs' Unopposed Motion for Attorneys' Fees and Costs, Administrative Costs, and Class Representatives' Enhancement Payments.
4. I am familiar with the factual bases of the claims asserted in the Consolidated Amended Complaint herein, and I have sufficient economic stake in the outcome of this case to ensure my vigorous prosecution and presentation of these claims for the entire class and believe my claims are typical of the class of the other proposed members of the class in this action.
5. I understand that as a class representative I must always consider the interests of the class just as I would consider my own interests and at times must put the interests of the class before my own interests.
6. To this end, and in connection with my involvement in this case, I have had numerous conferences with my attorneys, Douglas Caiafa and Christopher Morosoff, including prior to my participation in the lawsuit by way of the original Complaint on July 17, 2015, conferences in connection with my purchase history with Defendants and related issues, conferences and production of documents in preparation for my Declaration filed in support of Plaintiffs' Motion for Class Certification, preparation for and participation in my deposition and in connection with numerous other issues relating to the claims in this case.

- 1 7. In addition, I engaged in discussions with my attorneys in preparation for  
2 the full day mediation which took place with the Honorable Margaret A.  
3 Nagle, retired, on May 22, 2017, and subsequent discussions concerning  
4 settlement thereafter.
- 5 8. I have discussed the settlement and its terms with my attorneys, Douglas  
6 Caiafa and Christopher Morosoff, and am aware of and agree with the terms  
7 of the settlement. I also have the opinion that a fair and adequate  
8 compensation for myself as a Class Representative is no less than  
9 \$7,500.00. I have spent significant time and effort in gathering information,  
10 meeting and talking with other class members to assist in the preparation  
11 and prosecution of the lawsuit as well as my participation outlined above on  
12 behalf of the class.
- 13 9. I continue to support this lawsuit and believe that I have adequately  
14 represented both my legal interests and those of the class and will continue  
15 to do so.
- 16 10. I am aware that the Settlement Agreement authorizes each named Plaintiff  
17 to seek an Enhancement Payment in an amount to be determined by the  
18 Court but not to exceed \$7,500 each. My agreement to the Settlement was  
19 not and is not conditioned on the Court's approval of any incentive or  
20 enhancement payment to me, and I acknowledge that my right to seek an  
21 enhancement payment was not a condition of my approval of the  
22 Settlement.

23  
24 I declare under penalty of perjury that the forgoing is true and correct.

25 Executed this 12<sup>th</sup> day of March 2018, at Los Angeles, California.

26 \_\_\_\_\_  
27 Declarant, Robin Berkoff