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8 Attorneys for Plaintiffs STACI CHESTER, et al.

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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA, EASTERN DIVISION
12

13 STACI CHESTER, et al,
14
15 Plaintiffs,
16 vs.
17 THE TJX COMPANIES, INC., et al,
18 Defendants.
19

EDCV 15-01437 ODW (DTBx)
CLASS ACTION
DECLARATION OF THERESA
METOYER IN SUPPORT OF
MOTION FOR ATTORNEYS' FEES
AND COSTS; COSTS OF
ADMINISTRATION AND CLASS
REPRESENTATIVES'
ENHANCEMENT PAYMENTS

Courtroom: 5D – First Street
Date: May 14, , 2018
Time: 1:30 p.m.
Judge: Hon. Otis D. Wright, II

DECLARATION OF THERSA METOYER

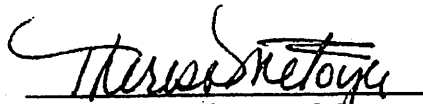
I, Theresa Metoyer, declare as follows:

1. I am a named Plaintiff in the matter pending before this Court in the action *Staci Chester et al. v. The TJX Companies, Inc. et al.*, U.S.D.C., E.D. Cal. 5:15-cv-01437- ODW-DTBx.
2. As such, 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 that 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 the
2 full day mediation which took place with the Honorable Margaret A. Nagle,
3 retired, on May 22, 2017, and subsequent discussions concerning settlement
4 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 of
7 the settlement. I also have the opinion that a fair and adequate compensation
8 for myself as a Class Representative is no less than \$7,500.00. I have spent
9 significant time and effort in gathering information, meeting and talking with
10 other class members to assist in the preparation and prosecution of the lawsuit
11 as well as my participation outlined above on behalf of the class.
- 12 9. I continue to support this lawsuit and believe that I have adequately represented
13 both my legal interests and those of the class and will continue to do so.
- 14 10. I am aware that the Settlement Agreement authorizes each named Plaintiff to
15 seek an Enhancement Payment in an amount to be determined by the Court but
16 not to exceed \$7,500 each. My agreement to the Settlement was not and is not
17 conditioned on the Court's approval of any incentive or enhancement payment
18 to me, and I acknowledge that my right to seek an enhancement payment was
19 not a condition of my approval of the Settlement.

20
21 I declare under penalty of perjury that the forgoing is true and correct.

22 Executed this 12th day of March 2018, at Los Angeles, California.

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25 Declarant, Theresa Metoyer