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8 *Class Counsel*

9 UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION

12 PAULA SPARKMAN, on behalf of herself and
13 all others similarly situated,

14 Plaintiff,

15 v.

16 COMERICA BANK, a foreign corporation, and
17 CONDUENT STATE & LOCAL SOLUTIONS,
18 INC., a foreign corporation,

19 Defendants.

NO. 4:23-cv-02028-DMR

**DECLARATION OF PAULA
SPARKMAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES, COSTS AND
SERVICE AWARDS**

The Honorable Donna M. Ryu

CLASS ACTION

20 I, Paula Sparkman, declare as follows:

21 1. I am over 18 years of age, I make this declaration based on my own personal
22 knowledge, and I am competent to testify to the facts in this declaration.

23 2. I am a single mother who receives court-ordered child support payments on a
24 Way2Go prepaid debit card. I rely on these funds to care for my daughter.

25 3. I hired my lawyers to file this lawsuit against Conduent State and Local Solutions,
26 Inc. and Comerica Bank after my Way2Go card was stolen out of my car and the thief made 21
27 charges totaling over \$1,000. Defendants denied my claim for reimbursement of the
unauthorized charges because their investigation found "conflicting information" and they could
not "confirm that fraud occurred." I told the lawyers about my efforts to seek reimbursement, my

1 interactions with Defendants’ employees, and the denial of my claim. They used this information
2 to write my complaint.

3 4. I stayed in contact with my lawyers throughout the case. I worked with my
4 lawyers to answer multiple sets of questions that Defendants asked me about my case. I also
5 gathered documents relating to my claim for reimbursement and my interactions with Defendants
6 and provided them to my lawyers.

7 5. I estimate that I have spent at least 50 hours working on this case since I first
8 spoke with my attorneys.

9 6. On June 4, 2024, Defendants took my deposition. I drove four hours from Red
10 Bluff to San Francisco to sit in person for the deposition. I spent hours preparing to be deposed
11 by reviewing key documents and meeting with my attorneys.

12 7. I attended and participated in two mediation sessions.

13 8. As a result of the theft and Defendants’ refusal to reimburse the unauthorized
14 charges to my Way2Go debit card, I did not have enough money to throw my daughter a
15 fourteenth birthday party. I had already sent out invitations and was humiliated that I had to
16 cancel.

17 9. I also suffered anxiety during this period as I attempted to get my money back
18 and, ultimately, learned that was not going to happen.

19 10. I had to relive these difficult experiences repeatedly as I spoke with my attorneys,
20 responded to discovery requests, sat for my deposition, and participated in mediation sessions.

21 I declare under penalty of perjury under the laws of the United States of America that the
22 foregoing is true and correct.

23 EXECUTED this 7 day of October, at Red Bluff, California.

24 By:  _____
25 Paula Sparkman
26
27