

CLARKSON LAW FIRM, P.C.
Glenn A. Danas (SBN 270317)
gdanas@clarksonlawfirm.com
Kristen G. Simplicio (SBN 263291)
ksimplicio@clarksonlawfirm.com
Maxim Gorbunov (SBN 343128)
mgorbunov@clarksonlawfirm.com
22525 Pacific Coast Highway
Malibu, CA 90265
Telephone: (213) 788-4050
Facsimile: (213) 788-4070

*Attorneys for Plaintiffs, the Putative Class,
and all other Aggrieved Employees*

[Additional counsel listed on following page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO**

LAUREN DANN, KATHRYN CUDE, and
MARY YOON, individually and on behalf of
all others similarly situated,

Plaintiffs,

vs.

THE RODAN + FIELDS COMPANY,
RODAN + FIELDS LLC, DR. KATIE
RODAN, DR. KATHY FIELDS, DIMITRI
HALOULOS, TIM ENG, LAURA BEITLER,
DALIA STODDARD, JESSICA RAEFIELD,
JANINE WEBER, and DOES 1-100

Defendants.

Case No.: CGC-24-612800

CLASS ACTION

Assigned for all purposes to:
Hon. Jeffrey S. Ross, Dept. 606

**AMENDED DECLARATION OF
LAUREN DANN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

PRELIMINARY APPROVAL HEARING

Date: June 20, 2025
Time: 9 a.m.
Dept: 606

Complaint filed: March 1, 2024
FAC filed: May 14, 2024

**ELECTRONICALLY
FILED**

*Superior Court of California,
County of San Francisco*

06/06/2025
Clerk of the Court
BY: ERNALYN BURA
Deputy Clerk

CLARKSON LAW FIRM, P.C.

Kristen G. Simplicio (SBN 263291)

ksimplicio@clarksonlawfirm.com

Laura E. Older

lolder@clarksonlawfirm.com

1050 Connecticut Ave. NW, Ste. 500

Washington, DC 20036

Telephone: (202) 688-2105

TYCKO & ZAVAREEI LLP

Shana H. Khader (*pro hac vice* forthcoming)

2000 Pennsylvania Avenue, NW, Suite 1010

Washington, District of Columbia 20006

Telephone: (202) 973-0900

Facsimile: (202) 973-0950

skhader@tzlegal.com

Emily Feder Cooper (State Bar No. 352951)

1970 Broadway, Suite 1070

Oakland, California 94612

Telephone: (510) 254-6808

Facsimile: (202) 973-0950

ecooper@tzlegal.com

*Attorneys for Plaintiffs, the Putative Class,
and all other Aggrieved Employees*

1 **AMENDED DECLARATION OF LAUREN DANN**

2 I, Lauren Dann, declare as follows:

3 1. I am an adult resident of the State of California, and, if called as a witness in this
4 action, I would testify truthfully to the matters described in this declaration. All of the matters
5 described in this declaration are within my personal knowledge, except those matters that are stated
6 to be upon information and belief. As to such matters, I believe them to be true.

7 2. I make this declaration entirely of my own free will and choice. I have not been
8 promised any benefit for doing so, and I have not been pressured into giving this declaration.
9 Before signing this declaration, I was given the opportunity to review it, make changes, and verify
10 the accuracy of its contents.

11 3. I am a former Consultant of Rodan and Fields, LLC (“R+F”). I worked for R+F
12 from approximately February 2019 to approximately March 3, 2023 as a Consultant. During that
13 time, I was classified as an independent contractor. My experience was typical of other class
14 members because throughout the entirety of my work for R+F, I was subject to all of R+F’s policies
15 and practices that have been alleged as unlawful in the complaint and the in Private Attorneys
16 General Act (“PAGA”) Notice sent to R+F and the Labor & Workforce Development Agency
17 (“LWDA”).

18 4. I believe I am adequate to represent the class. I am not aware of any adequacy issues
19 affecting my ability to represent the class and I am not aware of any conflicts between me and any
20 other class members. I also believe that my experiences are typical of and common amongst other
21 R+F Consultants. I followed R+F’s policies and procedures for all Consultants. For example, I did
22 not set prices on products I marketed and sold, which was instead done by R+F. I was required to
23 purchase any products I marketed with my own money and there was no method of reimbursement
24 for those purchases by R+F. I engaged and trained with other Consultants, usually either in my
25 Downline or Upline, and we would refer to R+F policies in training and selling.

26 5. I have actively participated in the litigation of this action. Prior to the initiating this
27 case, I provided Clarkson Law Firm, P.C. and Tycko & Zavareei LLP a detailed account of the
28 facts related to my work with R+F, including, but not limited to, facts alleging R+F had a policy

1 and practice of misclassifying its independent contractors, not paying for all off time worked, not
2 providing its Consultants with California compliant meal and rest periods, and not paying
3 premiums for violations. Additionally, I provided my counsel with documentation in support of
4 the claims brought against R+F including R+F's policies. These documents, along with the
5 information I shared regarding my work for R+F, assisted my attorneys in understanding the
6 policies and practices at R+F. I also regularly communicated with my attorneys and staff members
7 via telephone and email.

8 6. My attorneys explained to me the risks and benefits of bringing forward a class
9 action matter. I understood the risks, both professionally and financially, associated with pursuing
10 a class action case and acting as the Class Representative. I further understood that pursuing the
11 case as a class action, rather than individually, meant that it would take substantially longer as a
12 result of the multi-step approval process as mandated by the California Courts. Although I was
13 made aware that there was a possibility that I could receive nothing in the end, I believed that it
14 was important to ensure that R+F followed the law with respect to all of its independent contractors.
15 Additionally, I understood that it was my responsibility to act in the best interests of the class
16 members and not just myself. In that respect, I understood my duties and responsibilities to the
17 proposed class members and carried out and will continue to carry out those duties as necessary.

18 7. Throughout the course of the litigation, I maintained constant communication with
19 my attorneys and discussed pertinent matters relevant to the lawsuit. I asked questions when I
20 wanted to know what was being done to advance the interests of the class members or simply
21 wanted an update regarding the case. I understood that a recovery would not only benefit me but
22 would benefit other Consultants as well. At all times, I made myself available to answer any
23 questions that my attorneys had about my work for R+F.

24 8. This was especially true leading up to and during the mediation that took place on
25 July 5, 2024. In preparation for the mediation, I had extensive conversations with my attorneys
26 regarding the nuanced issues that we were going to advance during the negotiation process with
27 the mediator. During the mediation session, I was available to speak with my attorneys, answer
28 any questions that arose, and provide any additional documentation that was necessary to assist the

1 settlement discussions.

2 9. I reviewed the Class Action and PAGA Settlement Agreement and Class Notice
3 (“Settlement Agreement”) in full. My attorneys addressed all questions I had regarding the
4 Settlement Agreement. I believe the settlement terms and allocations are fair, adequate, and
5 reasonable given the strength of the class and representative claims and R+F’s defenses. I signed
6 the Settlement Agreement thereafter.

7 10. I estimate that I spent approximately 81 hours working on his case including
8 searching for and collecting documents related to my work for R+F, speaking with my attorneys
9 throughout the litigation, helping my attorneys prepare for mediation, discussing the particulars
10 and reasonableness of the settlement, and reviewing/signing documents related to the settlement.

11 11. I believe the settlement is a good settlement and I would recommend that the Court
12 approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad that I
13 had the opportunity to represent the class in this lawsuit and that I was able to recover money
14 through a settlement for the class.

15 12. I have observed my attorneys’ work throughout this case. They have been thorough,
16 diligent, prompt, courteous, and professional, and I believe they are fully entitled to the award of
17 fees that they have requested for their hard work. My attorneys informed me of the way in which
18 any fee award in this case would be split between Tycko & Zavareei LLP and Clarkson Law Firm
19 and how that would impact representation. At the time I retained these law firms, I signed a
20 document acknowledging that the two firms would evenly split the work between themselves and
21 share any fees 50/50. My attorneys later informed me that the fee split was changed so that the
22 Clarkson Law Firm would receive 55% and Tycko and Zavareei would receive 45% of any fee
23 award. I understand that the change in the fee split was in connection with one of the Tycko &
24 Zavareei lawyers on the case moving to the Clarkson Law Firm, which would take on a larger share
25 of the work as a result.

26 13. I did not make the decision to file a class action lightly. I was concerned by the
27 attention a publicly filed lawsuit, and especially a class action, would attract. My name would be
28 associated with a lawsuit that I filed against R+F. In fact, after I filed this lawsuit, this case was

1 publicized on the website https://behindmlm.com. The publisher found my Facebook page and
2 published an image of me and my family as part of the article. This level of attention made me
3 very uneasy and concerned for my family, especially considering that any changes to R+F's
4 policies regarding commissions could be attributed to the lawsuit. Nevertheless, I felt that
5 important rights were at stake that hurt everyone, and something ought to be done about it.

6 14. I understand that the settlement agreement provides an Enhancement Award in the
7 amount of \$15,000.00 to me. I believe this amount is fair compensation for my time and effort on
8 this case, for helping to prosecute this case, and for the risks I underwent. In addition, the settlement
9 requires that I enter into a general release, which I understand is broader than the release that will
10 bind other class members.


11 15. I respectfully request that the Court award me a \$15,000.00 Enhancement Award.
12 Based on my involvement in this case and the benefits provided to other class members, I can say
13 I helped stand up for the other Consultants who did not want to risk facing potential retaliation.

14 16. I do not have any interest, financial or otherwise, in the third-party administrator,
15 Veritas Global LLC.

16 ///

17 I declare under penalty of perjury, under the laws of the State of California and the United
18 States of America, that the foregoing is true and correct.

19
20 Executed on 06/05/2025 at Ventura, California.

21 
22 Lauren Dann (Jun 5, 2025 17:20 PDT)
23 Lauren Dann
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1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles. I am over the age of eighteen years and not a party to
3 the within entitled action. My business address is 22525 Pacific Coast Highway, Malibu, CA 90265.

4 On **June 6, 2025**, I served a copy of the following document(s) on the interested party(ies) and/or
5 person(s) identified on the Service List in the manner set forth below.

6 **Documents Served**

7 **AMENDED DECLARATION OF LAUREN DANN IN SUPPORT OF PLAINTIFFS'
8 MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

9 **Service List**

10 ELLIS GEORGE LLP Eric M. George egeorge@ellisgeorge.com Christopher T. Berg cberg@ellisgeorge.com 2121 Avenue of the Stars, Suite 3000 Los Angeles, CA 90067 <i>Attorneys for Defendants</i>	11 TYCKO & ZAVAREEI LLP Shana H. Khader skhader@tzlegal.com 2000 Pennsylvania Avenue, Northwest, Suite 1010 Washington, District of Columbia 20006 TYCKO & ZAVAREEI LLP Emily Feder Cooper ecooper@tzlegal.com 1970 Broadway, Suite 1070 Oakland, California 94612 <i>Attorneys for Plaintiff, the Putative Class, and all other Aggrieved Employees</i>
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16 **Method of Service**

17 **[X] BY ELECTRONIC MEANS:** I caused to be transmitted a true and correct copy of the foregoing
18 document(s) via File & Serve XPress to the interested party(ies)/person(s) as set forth on the above
19 service list pursuant to court order.

20 I declare under penalty of perjury under the laws of the State of California that the above is true and
21 correct.

22 Executed on **June 6, 2025**

23 /s/Antonia Smith
24 Antonia Smith