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6 Attorneys for Defendants
CHECK INTO CASH, INC. and
7 CHECK INTO CASH OF CALIFORNIA, INC.

8
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 FOR THE COUNTY OF LOS ANGELES

11 Christina Harvey; Dyrius Groomes; Tyrie
Dedrick; Armond Person; and Anthony Logan, on)
12 behalf of Themselves and the Class; Deron)
Hollins,)
13)

14 Plaintiffs,)

15 vs.)

16 Check Into Cash, Inc., an entity of unknown form;)
17 Check Into Cash of California, Inc., an entity of)
unknown form; and Does 1 to 10, inclusive,)

18 Defendants.)
19)
20)
21)
22)
23)

Case No.: BC609540

[Assigned for All Purposes to: Hon. Carolyn B. Kuhl, Dept. 12, Spring Street Courthouse]

**DECLARATION OF MARINA FOLEY IN
SUPPORT OF PLAINTIFFS'
SUPPLEMENTAL PRELIMINARY
APPROVAL PAPERS**

Hearing:
Date: October 14, 2021
Time: 11:30 a.m.
Dept.: 12

Complaint Filed: February 8, 2016
Trial Date: None Set

1 **DECLARATION OF MARINA FOLEY**

2 I, Marina Foley, declare as follows:

3 1. I am over the age of 18. I make this Declaration in support of Plaintiffs' supplemental
4 preliminary approval papers in the above-entitled action. I have personal knowledge of the facts stated
5 herein and if called to testify, I could and would competently testify to the facts contained herein.

6 2. I am the Regional Vice President for Check Into Cash of California, Inc. ("Check Into
7 Cash"). I am authorized to provide the following information on behalf of Check Into Cash.

8 3. I have served as Check Into Cash's Regional Vice President since November 4, 2018.

9 4. Check Into Cash offers its customers affordable, short-term, small dollar credit solutions,
10 including but not limited to, deferred deposit transactions (also commonly known as payday advances),
11 online payday advances, check cashing, Western Union, walk-in bill pay, and reloadable prepaid U.S.
12 Money Cards.

13 5. Currently, there are only 13 California Check Into Cash stores that operate as
14 buzzer/maglock stores. In those 13 stores, the store's main entry door remains locked during regular
15 business hours.

16 6. In a buzzer/maglock store, the store's main entry door remains locked at all times and
17 customers can only enter the store by being buzzed in by an employee.

18 7. For its buzzer/maglock stores, Check Into Cash currently employs a policy providing that
19 if an employee does not recognize a person as a returning patron or is not otherwise familiar with the
20 person, the employee is required to (i) greet the person at the locked door, (ii) ask the person to show
21 photo identification (either by holding the photo identification to the glass or slipping it through the door's
22 mail slot), (iii) write down the person's information (i.e., name, license number) as reflected on the photo
23 identification, (iv) return the photo identification to the person (if asked the person to slip the photo
24 identification through the door's mail slot), then (v) buzz the door to allow the person to enter the store.
25 Where the employee recognizes the person as a returning patron or is otherwise familiar with the person,
26 the employee need not ask the person to show photo identification prior to allowing the person to enter
27 the store.

Exhibit A

ID REQUIRED

Please have your
Government-issued identification in your hand and present it at
the door prior to entry

It is our policy to prohibit discrimination against consumers on the
basis of race, color, creed, national origin, gender, disability,
sexual orientation, or any other protected characteristic.

Questions or Complaints about this Policy? Call toll-free 1-800-504-9101