## E-Served: Oct 8 2021 6:45PM PDT Via Case Anywhere

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	CHECK INTO CASH, INC. and	
7	CHECK INTO CASH OF CALIFORNIA, INC.	
8	SUPERIOR COURT OF THE STATE OF CALIFORNIA	
9		
10	FOR THE COUNTY OF LOS ANGELES	
	Christina Hamany Duning Cooperate Truis	Cogo No . DC(00540
11	Christina Harvey; Dyrius Groomes; Tyrie  Dedrick; Armond Person; and Anthony Logan, on	Case No.: BC609540
12	behalf of Themselves and the Class; Deron	[Assigned for All Purposes to: Hon. Carolyn B. Kuhl, Dept. 12, Spring Street Courthouse]
13	Hollins,	DECLARATION OF MARINA FOLEY IN
14	Plaintiffs,	SUPPORT OF PLAINTIFFS'
15	vs.	SUPPLEMENTAL PRELIMINARY
		APPROVAL PAPERS
16	Check Into Cash, Inc., an entity of unknown form; Check Into Cash of California, Inc., an entity of	<u>Hearing</u> :
17	unknown form; and Does 1 to 10, inclusive,	Date: October 14, 2021 Time: 11:30 a.m.
18		Dept.: 12
19	Defendants.	Complaint Filed: February 8, 2016
20		Trial Date: None Set
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## **DECLARATION OF MARINA FOLEY**

- I, Marina Foley, declare as follows:
- 1. I am over the age of 18. I make this Declaration in support of Plaintiffs' supplemental preliminary approval papers in the above-entitled action. I have personal knowledge of the facts stated herein and if called to testify, I could and would competently testify to the facts contained herein.
- 2. I am the Regional Vice President for Check Into Cash of California, Inc. ("Check Into Cash"). I am authorized to provide the following information on behalf of Check Into Cash.
  - 3. I have served as Check Into Cash's Regional Vice President since November 4, 2018.
- 4. Check Into Cash offers its customers affordable, short-term, small dollar credit solutions, including but not limited to, deferred deposit transactions (also commonly known as payday advances), online payday advances, check cashing, Western Union, walk-in bill pay, and reloadable prepaid U.S. Money Cards.
- 5. Currently, there are only 13 California Check Into Cash stores that operate as buzzer/maglock stores. In those 13 stores, the store's main entry door remains locked during regular business hours.
- 6. In a buzzer/maglock store, the store's main entry door remains locked at all times and customers can only enter the store by being buzzed in by an employee.
- 7. For its buzzer/maglock stores, Check Into Cash currently employs a policy providing that if an employee does not recognize a person as a returning patron or is not otherwise familiar with the person, the employee is required to (i) greet the person at the locked door, (ii) ask the person to show photo identification (either by holding the photo identification to the glass or slipping it through the door's mail slot), (iii) write down the person's information (i.e., name, license number) as reflected on the photo identification, (iv) return the photo identification to the person (if asked the person to slip the photo identification through the door's mail slot), then (v) buzz the door to allow the person to enter the store. Where the employee recognizes the person as a returning patron or is otherwise familiar with the person, the employee need not ask the person to show photo identification prior to allowing the person to enter the store.

- 8. As part of the proposed class action settlement in the above-captioned matter and subject to the Court's approval of the same, Check Into Cash will agree to employ a new policy in every Check Into Cash store located within the State of California that has its doors locked during normal business hours as follows: Every single person regardless of race, color, creed, national origin, gender, disability, sexual orientation, or any other protected characteristic who is not an employee of Check Into Cash, and who seeks to enter a locked Check Into Cash store must, before entry, show his or her photo ID through the store window or door. Check Into Cash employees will not record, input, or otherwise memorialize any information presented in the individual's photo ID for purposes of admission into the store. Check Into Cash will display a sign or signs similar in content to the sign attached hereto as **Exhibit** A in any store in California that is locked during normal business hours such that that sign can be viewed by people outside of the store who attempt to enter the store.
- 9. Additionally, Check Into Cash will agree to upgrade its camera and security systems at its 13 current buzzer/maglock stores to include high-resolution cameras which will be mounted inside the stores and positioned to capture the stores' main entry door activity, including video images of the individual standing at the entry door and holding up his/her photo ID to the window or door. Generally, any recorded footage will be recorded over in the regular course of business every 90 days.
- 10. Check Into Cash anticipates that the technological upgrades described in the preceding paragraph will be completed in or around January 2022.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge. Executed this 7<sup>th</sup> day of October, 2021 at Yucaipa, California.

Marina Folsy MARINA FOLEY

## 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