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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

RASHON HAYES, individually and on behalf
of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the California
Private Attorneys Act;

Plaintiff,

vs.

THE CONTAINER STORE, INC., an
unknown business entity; and DOES 1 through
100, inclusive,

Defendant.

Case No. 20CV363825

Honorable Theodore Zayner
Department 19

CLASS ACTION

**DECLARATION OF RASHON HAYES
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action and
PAGA Settlement; Declaration of Proposed
Class Counsel (Elizabeth Parker-Fawley);
and [Proposed] Order filed concurrently
herewith]

Date: January 21, 2026
Time: 1:30 PM
Department: 19

Complaint Filed: February 10, 2020
FAC Filed: August 3, 2020
Trial Date: None Set

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1 connection with this matter on January 24, 2024. Subsequently, I spent time reviewing my
2 deposition transcript.

3 5. Throughout my involvement in this case, I was available to speak and meet with
4 my attorneys whenever they needed me. I responded to them as quickly as possible and gave them
5 as much information and identified as many documents as I could. I spent time speaking with my
6 attorneys about the case, identifying potential witnesses, providing my attorneys with documents
7 and information concerning the case, and also describing policies, practices, and procedures of
8 Defendant.

9 6. As far as the settlement is concerned, I was available to review documents and
10 answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the
11 Settlement Agreement and discussed the questions I had regarding the potential settlement with
12 my attorneys before signing the settlement papers.

13 7. I believe that I have done everything that my attorneys have asked of me and have
14 tried, to the best of my ability, to represent and seek relief for the Class, the PAGA Settlement
15 Group Members, and the State of California. I think my efforts helped to get the result obtained in
16 this case, and as a class and PAGA representative.

17 8. I respectfully request that the Court award me an Incentive Award in an amount up
18 to \$14,000.00 for my active participation in this case. Taking into consideration the time that I
19 have dedicated to this case and my broader individual waiver and release of claims with a
20 California Civil Code Section 1542 waiver (set forth in Paragraph 1.11.3 of the Settlement), I
21 believe that this amount is reasonable.

22 9. I am not related to anyone associated with Lawyers for Justice, PC.

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1 10. I have not entered into any undisclosed agreements, nor have I received any
2 undisclosed compensation in this case. The only compensation I will receive is whatever amount
3 the Court awards as an Incentive Award, as well as my share of the settlement as a Class Member
4 and as a PAGA Settlement Group Member.

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct.

7 Executed 09/05/2025, at San Jose, California.

8 The image shows a rectangular box containing a handwritten signature in black ink. The signature appears to be 'RH' with a stylized flourish. Above the signature, the text 'Electronically Signed' is visible on the left and '2025-09-06 01:25:20 UTC - 74.73.55.47' is visible on the right. Below the signature, the text 'Winters AssureSign®' is visible on the left and a long alphanumeric string 'f6d19d5c-e4cf-4d73-9863-b350000328d4' is visible on the right.

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