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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE**

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 General Act;

Plaintiff,

v.

SALT & STRAW, LLC, a California
Corporation; and DOES 1 through 100
inclusive,

Defendants.

Case No. 20STCV06626

Honorable Kenneth R. Freeman
Department 14

CLASS ACTION

**DECLARATION OF RASHON HAYES IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES, COSTS, AND CLASS
REPRESENTATIVE INCENTIVE
PAYMENT**

[Plaintiff's Motion for Final Approval of Class
Action Settlement, Attorneys' Fees, Costs, and
Class Representative Incentive Payment;
Declaration of Class Counsel (Brian J. St.
John); Declaration of Settlement Administrator
(Kevin Lee); and [Proposed] Final Approval
Order and Judgment filed concurrently
herewith]

Date: April 17, 2025
Time: 10:00 a.m.
Department: 14

Complaint Filed: February 20, 2020
FAC Filed: October 14, 2020
Trial Date: None Set

DECLARATION OF RASHON HAYES

I, **Rashon Hayes**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Salt & Straw, LLC (“Salt & Straw”) in an hourly-paid ice cream spinner from approximately July 2019 to December 2019. I decided to seek legal advice about my work experiences with Salt & Straw. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Salt & Straw was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **12** hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **8** hours discussing my situation, complex wage-and-hour class actions, and what it meant to be a named plaintiff and class representative.

3. I have spent over **26** hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and the Private Attorneys General Act (“PAGA”) representative, which included gathering documents concerning my employment with Salt & Straw, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of hourly paid, non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Salt & Straw. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. I was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **12** additional hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Salt &

1 Straw.

2 5. As far as the settlement is concerned, I spent about 5 hours reviewing the
3 settlement agreement and about 3 hours asking questions and discussing the potential settlement
4 with my attorneys before signing the settlement agreement.

5 6. I believe that I have done everything that my attorneys have asked of me and have
6 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
7 and the State of California. I think my efforts helped to get the result obtained in this case, and
8 as a class and PAGA representative, I respectfully request that the Court award me an incentive
9 payment in the amount of \$10,000.00 for my active participation in this case. Taking into
10 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

11 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

12 8. I have not entered into any undisclosed agreements, nor have I received any
13 undisclosed compensation in this case. The only compensation I will receive is whatever amount
14 the Court awards as an incentive payment, as well as my share of the settlement as a class
15 member and as an aggrieved employee.

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

05/18/22

18 Executed this ____ day of May 2022, at Orlando, Florida.

19  Electronically Signed 2022-05-18 23:13:55 UTC - 108.202.111.92
Nintex AssureSign® 2b239416-f7a8-4072-bdab-ae980182bcd1

20 Rashon Hayes