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RICHARD BAUTISTA, and all others similarly situated

7 (Additional attorneys for parties on following page)

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **FOR THE COUNTY OF YOLO**

10 **(UNLIMITED JURISDICTION)**

11
12 JENICA COLE, SHAUNA ADAMS,
13 KASSANDRA MENDIVIL, RICHARD
14 BAUTISTA, MICHAEL NEVAREZ, JOE
15 NUNEZ, and HUNTER MEELEE, on behalf of
16 themselves and all others similarly situated, and
17 as “aggrieved employees” on behalf of other
18 “aggrieved employees” under the Labor Code
19 Private Attorneys General Act of 2004,

20 *Plaintiff(s),*

21 vs.

22 STRATEGIC GREEN PARTNERS LLC
23 DOING BUSINESS AS AUTHENTIC 760, a
24 California limited liability company; IGS
25 SOLUTIONS LLC, a California limited liability
26 company; SHRYNE GROUP, INC., a California
27 corporation; STIIIZY, LLC, a California limited
28 liability company; IRONWORKS
COLLECTIVE, INC., DOING BUSINESS AS
BLAZE, a California corporation; TONY
HUANG, an individual; and DOES 1–50,
inclusive,

Defendant(s).

Case No. CV2021-0426

**DECLARATION OF CHANTAL
PAYTON IN SUPPORT OF
PLAINTIFFS KASSANDRA
MENDIVIL, RICHARD BAUTISTA,
JENICA COLE, SHAUNA ADAMS,
MICHAEL NEVAREZ, JOE NUNEZ,
AND HUNTER MEELEE’S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

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SOLUTIONS LLC, SHRYNE GROUP, INC., STIIZY, LLC, and IRONWORKS
COLLECTIVE, INC., DOING BUSINESS AS BLAZE

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1. I am an attorney licensed to practice law before all the courts of the State of California and am the Managing Shareholder of the firm Payton Employment Law, PC. I am an attorney of record for Plaintiff Richard Bautista.
2. The facts contained in this declaration are based on my personal knowledge of this matter, except as where stated as upon information and belief, and as to those facts I believe them to be true. If called to testify, I could and would competently testify to the matters herein.
3. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement.
4. I am a 2013 graduate of the University of San Diego School of Law. Following my first year of law school, I held an internship in the legal department of Sony Electronics, Inc. and assisted the Company with employment litigation and advice. Subsequently, I held a clerkship at the California Attorney General's Office, in the Employment and Administrative Mandate section, where I helped defend the State of California in employment disputes brought by state employees. Thereafter, I held a law clerk position at a well-respected employment defense firm in San Diego and served as an extern in the chambers of the Honorable John A. Houston at the United States District Court, Southern District of California.
5. During my first year of practice, I practiced plaintiff's-side employment law at a boutique employment law firm in Los Angeles with a significant focus on wage and hour litigation.
6. For about 3 ½ years thereafter, I continued to practice plaintiffs'-side employment litigation as a Managing Partner of Knight Employment Law, where I represented hundreds of employees in wage and hour and other employment matters throughout that time.
7. I continued focusing my practice on plaintiff's side employment law litigation practice as well as class actions after forming my law firm Payton Employment Law (now Payton Employment Law, PC) in 2018. Since that time, I have built a thriving seven-attorney law firm with a team of support staff, including three paralegals, and multiple law clerks and assistants,

1 based on my ability to manage cases and provide exceptional work.

2 8. I have represented or advised several hundred individual clients and obtained millions of
3 dollars in settlements and judgments throughout my career. I have been approved as Class
4 Counsel in numerous Class Action and/or PAGA actions that I have litigated over the past several
5 years and have been awarded attorneys' fees after wage and hour trials that I prevailed in where
6 representing the plaintiff.

7 9. In 2019 through 2023, I was recognized as a Rising Star in Labor and Employment Law
8 by "Southern California Super Lawyers." I was also named to two of the Super Lawyers' Top
9 Attorney "Best of the Best" Lists for Southern California in 2022 and 2023, including the Up-
10 and-Coming 50 List of Women Southern California Rising Stars as well as the Up-and-Coming
11 100 List of Southern California Rising Stars.

12 10. Although not exhaustive, below is a representative list of several of the wage and hour
13 class actions and PAGA actions where I was lead counsel and/or performed substantial work on
14 representing the Plaintiff:

- 15 a. *Murakami v. Jin's Dining U.S.A., et al.*, Los Angeles Superior Court Case No.
16 BC646595 (Final Approval of Settlement of Class Action granted on August 3, 2018)
- 17 b. *Pineda v. Providence Health & Services, et al.*, Los Angeles Superior Court Case No.
18 BC652459. (Final Approval of Settlement of Class Action granted on February 26,
19 2019)
- 20 c. *Shawna Fermin v. University of Antelope Valley, et al.*, Kern County Superior Court
21 Case No. BCV-19-101530 (Final Approval of Settlement of Class Action granted on
22 January 28, 2020)
- 23 d. *Christina Cashio v. Moss & Company, Inc., et al.*, Los Angeles Superior Court Case
24 No. BC631421 (Approval of PAGA Settlement granted on October 27, 2020)
- 25 e. *Frank Wells v. San Fernando Recovery Center et al.*, Los Angeles Superior Court
26 Case No. 20STCV24207 (Approval of PAGA Settlement granted on December 15,
27 2020)

- 1 f. *Joel Villalpando v. Red Sparrow Services, Inc. et al.*, Orange County Superior Court
2 Case No. 20STCV24207 (Approval of PAGA Settlement granted on May 18, 2021)
- 3 g. *Lacayo v. Catalina Restaurant Group, Inc.*, San Bernardino Superior Court, Case No.:
4 1713877 (Final Approval of Settlement of Class Action granted on December 15,
5 2021)
- 6 h. *Robert Reynolds v. W.C.C.S., Inc. et al.*, Alameda Superior Court, Case No.:
7 RG20069294 (class action pending)
- 8 i. *Ismail Alammari v. Ocean Cities Pizza, Inc. et al.*, Contra Costa Superior Court, Case
9 No.: CIVMSC19-02640 (class action pending)
- 10 j. *Emmanuel Turner et al. v. S&S Labor Force Inc.*, Los Angeles Superior Court, Case
11 No.: 23STCV11969 (class action pending)
- 12 k. *Jeremy Hartwell v. Kinetic Content, LLC et al.*, Los Angeles Superior Court, Case
13 No.: 22STCV21223 (class action pending)
- 14 l. *Shahrokh Yeganeh v. Amerisave Mortgage Corporation.*, Orange Superior Court,
15 Case No.: 30-2022-01274803-CU-OE-CXC (class action pending)
- 16 m. *Normandy Vamos v. American Idol Productions, Inc. et al.*, Los Angeles Superior
17 Court, Case No.: 23STCV02514 (class action pending)

18 11. In addition to the above matters, I have prior experience defending employers in several
19 other class action matters.

20 12. I do not have any conflicts of interest with the class representatives or with the class and
21 have not previously represented the Defendants, nor have any of the attorneys from my office
22 involved in the litigation of this case.

23 13. As such, I am highly qualified to act as Class Counsel in this matter, having extensive
24 experience in wage and hour and class action employment matters well beyond what is required
25 to serve as adequate class counsel. I will continue to represent the class members zealously and
26 ethically in this case and protect the interests of the class.

27 ///

1 14. On January 12, 2024, the Settlement Agreement for this matter was uploaded with the
2 LWDA in relation to Richard Bautista's PAGA Notice.

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

5
6 Executed on January 12, 2024 in Acton, California.

7
8 
9 Chantal Payton, Esq.