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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA**

WILLIAM HALL, individually, and on
behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiff,

vs.

TERRAVANT WINE COMPANY, LLC, a
California limited liability company;
SUMMERLAND WINE BRANDS, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 20CV03971

Honorable Timothy J. Staffel
Department 3

**DECLARATION OF WILLIAM HALL IN
SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL.
LABOR CODE § 2698, *ET SEQ.*)
SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEYS' FEES,
ATTORNEYS' COSTS, ENHANCEMENT
PAYMENT, AND SETTLEMENT
ADMINISTRATION COSTS**

[Notice of Motion and Motion for Approval of
Private Attorneys General Act (Cal. Labor
Code § 2698, *Et Seq.*) Settlement Agreement
and Award of Attorneys' Fees, Attorneys'
Costs, Enhancement Payment, and Settlement
Administration Costs; Declaration of Plaintiff's
Counsel (Edwin Aiwazian); and [Proposed]
Order and Judgment filed concurrently
herewith]

Date: April 27, 2022
Time: 8:30 a.m.
Department: 3

Complaint Filed: November 20, 2020
Trial Date: None Set

DECLARATION OF WILLIAM HALL

I, **William Hall**, 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, and 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 Defendant Terravant Wine Company, LLC dba Summerland Wine Brands ("Terravant") from approximately April 2018 to approximately January 2020 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences at Terravant and about filing a lawsuit to seek to redress my grievances. I contacted Lawyers for Justice, PC and spoke with the attorneys there. I wanted to take steps to make sure Terravant was held accountable for not properly compensating aggrieved employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately 7 hours. Thereafter, I consulted with the attorneys at Lawyers for Justice, PC for almost 6 hours discussing my situation, representative action lawsuits under the Private Attorneys General Act ("PAGA") in general, and what it meant to bring a PAGA action.

3. I have spent over 17 hours communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which has included gathering and providing documents concerning my employment with Terravant, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of other non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Terravant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and to provide them with any additional information that I had obtained.

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