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Attorneys for Plaintiff WAFA MWANES

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

WAFA MWANES, an individual, on behalf of
herself, and on behalf of all persons similarly
situated,

Plaintiff,

vs.

ABOUT FOOD INC. dba RELANDS RANCH
MARKET, an unknown business entity; and
DOES 1 through 50, Inclusive,

Defendants.

Case No. CIVDS2018742

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

Date: August 14, 2023

Time: 1:30 p.m

Judge: Hon. Joseph T. Ortiz

Dept.: S-17

1 I, WAFA MWANES, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am the named Plaintiff in the above
4 wage and hour class action filed against ABOUT FOOD INC. dba RELANDS RANCH MARKET
5 (hereinafter "Defendant").

6 2. This declaration is being submitted in support of Plaintiff's Motion for Preliminary
7 Approval of Class Action and PAGA Settlement.

8 3. I believe that I am, have been and will continue to represent the interests of the class
9 fairly and adequately. I have claims that are typical of the claims the Class Members that I am seeking
10 to represent.

11 4. I worked for Defendant as an hourly, non-exempt, employee in California from May of
12 2020 to October of 2020. At all times during my employment, I earned an hourly wage and was entitled
13 to legally compliant meal and/or rest periods, and minimum, regular and overtime wages for all hours
14 worked. Throughout my employment, I was subject to Defendant's written policies and procedures
15 contained in, among other documents, the "Employee Handbook."

16 5. Generally, my lawsuit claims that Defendant failed to furnish accurate itemized wage
17 statements, failed to provide compliant meal and rest periods, failed to pay for all time worked, and
18 failed to pay all wages upon separation.

19 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
20 to represent because I was subject to the same alleged unlawful employment policies and practices at
21 issue in this action, including but not limited to, Defendant's failure to provide complaint meal and
22 rest periods, failure to pay for all hours worked, failure to furnish accurate itemized wage statements,
23 and failure to pay all wages when due. Factually, Defendant's policies and practices apply class wide,
24 and Defendant's liability can be determined by facts common to all members of the Class.

25 7. Further, there is no conflict between my interests and the interests of the class that I am
26 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that
27 I was injured by the same company-wide policies and practices to which the proposed Class was
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1 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
2 of the Class by initiating this litigation, undertaking extensive class discovery, and evaluating the
3 proposed settlement to assure that it is fair.

4 8. I understood at the time that I filed this action, that as a Class Representative, I owed a
5 duty to the putative class members to faithfully prosecute this action with their best interests at the
6 forefront of every decision. I understood that I could not make any decision in this action for the sole
7 benefit of my personal interest. I understood that in executing this duty, I might have been asked to
8 sacrifice my personal best interests for the benefit of the interests of the putative class members.
9 Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible
10 relief for my former co-workers for what I perceived to be Defendant's unlawful wage and hour
11 practices. I believe that I faithfully executed the duties of a Class Representative throughout this
12 litigation and will continue to do until this litigation is fully and finally resolved.

13 9. I believe that the proposed settlement before the Court is fair, reasonable, and adequate,
14 and made in the best interest of the Settlement Class Members. Consequently, I respectfully, and
15 humbly, I ask the Court to grant preliminary approval of the Settlement and all of its terms.

16 I declare under the penalty of perjury under the laws of the State of California that the foregoing
17 is true and correct. Executed Jun 28, 2023, at Wm, California.

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19 By: 
20 WAFA MWANES
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