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ZAKAY LAW GROUP, APLC

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Attorneys for Plaintiff

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 REDLANDS
RANCH MARKET, an unknown business
entity; and DOES 1 through 50, Inclusive,

Defendants.

Case No. CIVDS2018742

**DECLARATION OF SHANI O. ZAKAY,
ESQ. IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: February 13, 2024

Time: 1:30 p.m.

Judge: Hon. Joseph T. Ortiz

Dept.: S-17

1 I, SHANI O. ZAKAY, declare as follows:

2 1. I am the managing partner of the law firm of Zakay Law Group, APLC, co-counsel
3 of record for Plaintiff in this matter. As such, I am fully familiar with the facts, pleadings, and
4 history of the matter. The following facts are within my own personal knowledge, and if called as
5 a witness, I could testify competently to the matters stated herein.

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

8 3. My firm has worked on this matter over the course of the litigation during the last
9 seventeen months. My credentials are reflected in the Zakay Law Group, APLC firm resume, a true
10 and correct copy of which is attached hereto as Exhibit #A. Some of the major cases my firm has
11 undertaken are also set forth in Exhibit #A. I have had class litigation experience, mostly in the area
12 of employment class actions, unfair business practices, and other complex litigation. I have
13 experience in cases involving labor code violations and wage and hour claims. I have litigated
14 similar wage and hour cases against other employers on behalf of employees. I have been approved
15 as experienced class counsel in courts throughout California. It is this level of experience which
16 enabled my firm to undertake the instant matter and to successfully combat the resources of the
17 defendants and its capable and experienced counsel.

18 I declare under the penalty of perjury under the laws of the State of California that the
19 foregoing is true and correct. Executed this 19th day of January 2024, at San Diego, California.

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21 **ZAKAY LAW GROUP, APLC**

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23 By: 

24 Shani O. Zakay
25 Attorney for Plaintiff
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