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Attorneys for Plaintiffs and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

CHRIS WARD, JOSE PEREDA, and
TAWNY MILLIGAN, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other ag-
grieved employees pursuant to the California
Private Attorneys General Act,
Plaintiffs,

v.

RELISH LABS LLC, D/B/A HOME CHEF,
an unknown business entity; and DOES 1
through 100, inclusive,
Defendants.

Case No.: CIVSB2113821

Honorable David Cohn
Department S26

CLASS ACTION

**DECLARATION OF CHRIS WARD IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Final Approval of Class Action Settlement;
Declaration of Proposed Class Counsel (Ed-
win Aiwarzian); Declarations of Proposed
Class Representatives (Tawny Milligan and
Jose Pereda); Declaration of Settlement Ad-
ministraror (Jarrod Salinas); and [Proposed]
Order filed concurrently herewith]

Date: July 13, 2023
Time: 10:00 a.m.
Department: S26

Complaint Filed: May 13, 2021
FAC Filed: August 26, 2022
Trial Date: None Set

DECLARATION OF CHRIS WARD

I, **Chris Ward**, 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 Relish Labs LLC, d/b/a Home Chef (“Home Chef”) in an hourly-paid, non-exempt quality control technician position from May 2018 to March 2020. I decided to seek legal advice about my work experiences with Home Chef. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Home Chef was held accountable for not paying their employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and representative lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **4 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **6 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative.

3. I have spent over **20 hours** meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Home Chef, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of hourly and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Home Chef. 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 obtained.

4. As the case progressed, 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

1 attorneys with documents and information concerning the case, and also describing policies,
2 practices, and procedures of Home Chef.

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

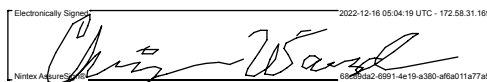
6 6. I believe that I have done everything that my attorneys have asked of me and have
7 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
8 and the State of California. I think my efforts helped to get the result obtained in this case, and
9 as a class and PAGA representative, I respectfully request that the Court award me an incentive
10 award in the amount of \$7,500.00 for my active participation in this case. Taking into
11 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

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

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

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

19 Executed this day 12/15/2022, at San Bernardino, California.

20 The image shows a rectangular box containing a handwritten signature in black ink. Above the signature, the text "Electronically Signed" is visible. To the right of the signature, a timestamp "2022-12-16 05:04:19 UTC - 172.58.31.169" is present. Below the signature, there is a long alphanumeric string: "68b9da2-6991-4e19-a380-af6ad11a77a5".

21 Chris Ward