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Attorneys for Plaintiffs

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

CHRIS WARD, individually, and on behalf of
other members of the general public similarly
situated and on behalf of other aggrieved
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 TAWNY
MILLIGAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Annabel Blanchard); Declarations
of Proposed Class Representatives (Chris
Ward and Jose Pereda); and [Proposed]
Order filed concurrently herewith]

Date: December 23, 2022
Time: 10:00 a.m.
Department: S26

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

DECLARATION OF TAWNY MILLIGAN

I, **TAWNY MILLIGAN**, 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 a non-exempt, hourly paid Production Worker position from February 2019 to February 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 **5 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 **19 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-paid 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 my most current information and any additional information that I had obtained.

4. Throughout my involvement in the litigation, I was available to answer any questions my attorneys had, and 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

1 identified as many documents as I could. I spent at least **14 additional hours** speaking with my
2 attorneys about the case, identifying potential witnesses, providing my attorneys with documents
3 and information concerning the case, and also describing policies, practices, and procedures of
4 Home Chef.

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

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

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

15 8. I have not entered into any undisclosed agreements, nor have I received any
16 undisclosed compensation in this case. The only compensation I will receive is whatever amount
17 the Court awards as a service payment, as well as my share of the settlement as an aggrieved
18 employee.

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

21 Executed this day 12/02/2022, at Victorville, California.

22 Electronically Signed 2022-12-02 21:33:41 UTC - 68 118 143 190
Tawny Milligan
Nintex AssureSign® d53d8f01-22bd-4a9e-9b80-af501616eaf

23 Tawny Milligan
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