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Attorneys for Plaintiff KASSANDRA VASQUEZ, individually and on behalf of all other similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF TULARE

KASSANDRA VASQUEZ, individually and
on behalf of all others similarly situated,

Plaintiffs,

vs.

RLMK, INC., dba MCDONALD'S, a
California Corporation; and DOES 1-50,
inclusive

Defendants.

CASE NO. VCU280653

Assigned to the Hon. Nathan Ide

**DECLARATION OF KASSANDRA
VASQUEZ IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: June 7, 2021
Time: 08:30 a.m.
Dept.: 2

DECLARATION OF KASSANDRA VASQUEZ

I, KASSANDRA VASQUEZ, hereby declare as follows:

1. I am over the age of eighteen and I submit this Declaration in support of the motion for preliminary approval of the settlement and fees, costs and enhancement. The following is based upon my personal knowledge and if called as a witness, I could and would competently testify thereto.

2. I was employed by Defendants working at their McDonald's restaurants in Visalia as a non-exempt employee during the Class Period. I began my employment in approximately August 2011 and held numerous job positions while working for Defendants. I typically worked 5-6 days a week and approximately 30 hours per week.

3. As a non-exempt employee, I suffered the same damages as other employees. These included not being paid all my wages including overtime, not provided meal periods or permitted rest periods, not provided accurate wage statements, and not paid all my wages on time, not reimbursed expenses when I had to go to other stores to cover for other employees or go to the bank for change, all in accordance with California law. As a result of these alleged violations, I sought consultation with my attorneys at James Hawkins, APLC.

4. Based upon my allegations, and after consultation and full disclosure from my attorneys about the potential risks I faced as a Plaintiff in a putative class action, I freely decided to pursue this lawsuit to try and vindicate my rights and the rights of others who also worked for Defendants and suffered similar harms due to Defendant's common practices and policies.

5. Prior to filing my action, my attorneys and I had multiple conferences about the factual bases for the claims that I wanted to pursue against Defendants. During those conferences, my attorneys provided me with an overview of how those claims would be litigated and generally educated me about the nature of complex/representative litigation and my role as the representative Plaintiff.

6. My attorneys provided me with a draft of the complaint for my review and

1 approval. I closely reviewed the complaint to ensure accuracy and completeness. As a
2 result, I caused my attorneys to file the class action complaint alleging claims for the
3 allegations alleged therein. Thereafter, I have been fully involved in my case.

4 Following the filing of the complaint, I collaborated with my attorneys on the
5 prosecution of my claims, and I regularly contacted my attorneys to stay current on the
6 status of the litigation, and to discuss my attorneys' progress in prosecuting the claims.

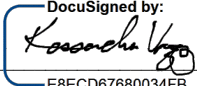
7 7. Since I believe I was not accurately paid wages including overtime, not
8 timely paid wages, not provided lunches and not permitted my rest breaks, and therefore
9 not provided accurate itemized wage statements, I believe that I have been similarly
10 injured as to all other class members in the settlement who worked for Defendant during
11 the class period. I believe the claims asserted in the Complaint is also shared by the
12 other Class Members. I worked with various other non exempt employees and I believe
13 we were all treated the same and subject to the same unlawful policies.

14 8. Since I agreed to become a Class Representative, I have worked every step
15 of the way with my attorneys. During the course of the litigation I have always kept the
16 best interest of the Class Members on equal footing as mine. I have been, and I am
17 willing to continue to pursue the Class Members' claims vigorously on our collective
18 behalf if the Settlement is not finally approved. As a result, I firmly believe that I do
19 not have any interests adverse to the interests of the Class Members. I have maintained
20 the Class Members best interest from the inception of the case.

21 9. As a Class Representative, I have spent time many hours working on this
22 case. I have spent numerous hours consulting with my attorneys, providing
23 documentation, consulting with other Class Members, responding to questions from y
24 attorneys, providing documents to my attorneys, working with my attorneys to review
25 documents received, helping my attorneys in preparing for the mediation and attending
26 the mediation via telephone. I was consulted about the status of the case and provided
27 constant feedback about the case from my attorneys including the mediation, settlement
28 negotiations and eventual settlement.

1 10. From the beginning of this case, I have freely chosen to accept the risks of
2 being a Class Representative in this class action lawsuit. I chose to assume these risks
3 and pursue the claims on behalf of the Class Members as I wanted to vindicate their
4 rights. I believe we have achieved that result with the settlement and the individual
5 payments to the Class Members. I believe the settlement is fair reasonable and adequate
6 based on the numerous defenses asserted by Defendants. I believe the efforts and work I
7 put forth helped to achieve the fair settlement that will benefit the Class Members. As a
8 result of my efforts, I also believe the Class Representative Payment is reasonable and I
9 respectfully request the Court approve the amount of \$7,500 as fair and reasonable.

10 I declare under penalty of perjury under the laws of the state of
11 California that the foregoing is true and correct. Executed on May 13, 2021,
12 at Farmersville, California.

13
14 DocuSigned by:
15 
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17 KASSANDRA VASQUEZ