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GROUP, LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF RIVERSIDE

ANA RAYOS, individually, and on behalf of
other members of the general public similarly
situated

Plaintiff,

v.

RESTAURANT LEADERSHIP GROUP,
LLC, an unknown business entity; and DOES
1 through 100, inclusive,

Defendant.

Case No. CVRI2000689

**DECLARATION OF CRYSTAL SAINZ
RE CLASS MEMBERS' AGE,
EDUCATION, LANGUAGES, IN
SUPPORT OF MOTION FOR
APPROVAL OF CLASS ACTION
SETTLEMENT**

DECLARATION OF CRYSTAL SAINZ

I, Crystal Sainz, hereby declare as follows:

1. I am a Director of Payroll and HR Services, I provide payroll and HR-related support services to Restaurant Leadership Group, LLC ("RLG"), located in Murrieta, CA. I have personal knowledge of the information contained in this declaration or know of it by review of the files maintained by RLG in the normal course of business, and if called as a witness in this matter I could and would competently testify thereto under oath.

2. In my position, I have access to all human resources files of RLG's employees,

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including all of those employed by RLG who make up the putative class in the lawsuit (the “Action”) filed by plaintiff Ana Rayos (“Plaintiff.”)

3. I am aware that the Parties to this Action reached an agreement to settle all claims in the Action at a mediation that occurred on December 4, 2023.

4. As part of the settlement agreement entered between the parties, and in order to comply with the Court’s operative Complex Litigation Case Management Order, RLG agreed to provide a declaration from a RLG representative with personal knowledge as to the likely age, education, and experience of the Class Members, as well as their ability to read and comprehend the English language.

5. Based on my review of the personnel files of the putative Class Members and my familiarity with RLG’s business and its workforce as comprised by the putative class, I have the requisite personal knowledge to provide the information agreed upon between the parties in the Class Action Settlement Agreement.

6. In accordance with Paragraph 6.2 of the Parties’ Class Action Settlement Agreement, and the Court’s Complex Litigation Case Management Order, the following information is provided by RLG regarding the Class Members:

- a. Age Range of Class Members: 16-70
 - i. Mean Age: 30
 - ii. Median Age: 26
- b. Education Level of Class Members., estimated:
 - i. Members with high school diploma or GED: 89%
 - ii. Members with college degree: 10% or less
 - iii. Other: 1%
- c. Languages of Class Members, estimated:
 - i. Members who speak / comprehend only English: 30%
 - ii. Members who speak / comprehend English and Spanish: 50%

iii. Members who speak / comprehend only Spanish: 20%

RLG's workforce as comprised by the Class Members regularly engages in the speaking and reading of the English language throughout the course of the work day, though the primary two languages used are English followed by Spanish.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on August 22, 2024, at Murrieta, California.

Crystal Sainz
Crystal Sainz