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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

DANGELO RANDLE-TATUM, an individual,
on behalf of himself and others similarly
situated

PLAINTIFF,

v.

HOPDODDY BURGER BAR, INC.; and
DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. 21STCV21015

[Case Assigned for All Purposes to Hon.
Yvette M. Palazuelos in Dept. 9]

**DECLARATION OF PLAINTIFF
DANGELO RANDLE-TATUM IN
SUPPORT OF FINAL APPROVAL OF
CLASS SETTLEMENT**

Date: May 16, 2023
Time: 10:00 AM
Dept.: 9

Complaint Filed: June 4, 2021
Trial Date: None Set

DECLARATION OF DANGELO RANDLE-TATUM

I, DANGELO RANDLE-TATUM, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant HOPDODDY BURGER BAR (“Hopdoddy” or “Defendant”) as an hourly employee.

3. I brought this lawsuit, on behalf of myself and all other Class Members, against Defendant because I believe that HOPDODDY BURGER BAR failed to pay wages and/or overtime, failed to provide meal and rest breaks, failed to reimburse business-related expenses, failed to issue accurate itemized wage statements, and failed to pay all wages due at the time of termination or resignation.

4. I understand that I am representing other employees and I believe that I am able to represent them well.

5. I first researched attorneys who are very experienced with these types of lawsuits. It was important to me to find attorneys with a lot of experience in this area of the law. Once retained, I compiled relevant documents from my employment to assist my attorneys in litigating this case. I worked with my attorneys to develop the facts and legal claims in this lawsuit. I knew that I would be representing other employees and the class action lawsuit was filed on June 4, 2021.

6. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the Settlement as needed. My work in connection with this matter includes: providing information to my attorneys regarding the conditions of my employment with Defendant and my experiences and observations at work; staying in regular contact with my attorneys to discuss the status of the case; responding promptly to my attorneys’ various communications regarding this matter, remotely attending a full-day mediation on March 8, 2022 by video conference; and reviewing and analyzing the settlement agreement and settlement papers to ensure

1 the settlement was fair and reasonable and in the best interests of all the member of the class.

2 7. I estimate the total time spent in connection with this matter is approximately 30-
3 40 hours.

4 8. I believe that I have worked to actively represent the other Class Members and their
5 interests, and have put the Class Members' interests ahead of my own personal interests during
6 this litigation.

7 9. I am prepared to seeing this settlement trough meaning that I will continue assisting
8 with this litigation as needed and am committed to achieving the best possible results for the Class.

9 10. I believe that the class action settlement obtained on behalf of the Class is fair and
10 reasonable in light of the issues involved in this case. As mentioned above, I reviewed and
11 discussed the Settlement Agreement with my attorneys and asked them questions about it to ensure
12 that I understood its terms and what it would mean for all of the class members.

13 11. I believe that I have fairly represented the absent Class and request that the Court
14 finally approve this settlement and confirm me as the Class Representative.

15 12. I am not aware of any conflicts of interest that prevent me from being confirmed as
16 Class Representative in this Lawsuit. I am not related in any way to my attorneys or to any other
17 member of the firm that is representing me. I have no business dealings or other involvement
18 beyond this lawsuit and this representation. I have not been promised any money or inducement
19 to serve as Class Representative in this Lawsuit.

20 13. It is my opinion that the settlement agreement provides for a fair and adequate
21 enhancement for me as a Class Representative, in the amount of \$7,500. I believe that this is fair
22 and reasonable in light of all of the work that I have performed in my role of finding competent
23 lawyers, bringing this case, and acting as the Class Representative. As Class Representative, I
24 have actively participated in all stages of the litigation, as detailed above, and have always
25 maintained the best interests of the Class while performing my Class Representative duties.

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Executed this 4th day of April, 2023 at Los Angeles, California.

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**DECLARATION OF PLAINTIFF DANGELO RANDLE-TATUM IN SUPPORT OF FINAL APPROVAL
OF CLASS SETTLEMENT**

(PROOF OF SERVICE)

[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On April 20, 2023, I served all interested parties in this action the following documents described as: **DECLARATION OF PLAINTIFF DANGELO RANDLE-TATUM IN SUPPORT OF FINAL APPROVAL OF CLASS ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

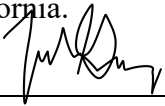
Janet Grumer Evelyn Wang Tiffanie de la Riva jgrumer@dwt.com evelynwang@dwt.com tiffaniedelariva@dwt.com Davis Wright Tremaine LLP 865 South Figueroa Street, 24th Floor Los Angeles, CA 90017-2566	Emil Davtyan emil@davtyanlaw.com Davtyan Law Firm, Inc. 400 N. Brand Blvd, Suite 700 Glendale, CA 91203
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[XX] (BY ELECTRONIC MAIL THROUGH CASE ANYWHERE) On interested parties set forth on the attached service list.

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 20, 2023, at Los Angeles, California.


Taylor Gregg