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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SACRAMENTO**

REGINALD ANTONIO CHAVIS JR., an
 individual, on behalf of himself and others and
 others similarly situated

PLAINTIFF,

v.

GROCERY OUTLET INC.; and DOES 1 thru
 50, inclusive,

DEFENDANTS.

CASE NO. 34-2021-00309003

[Case Assigned for All Purposes to Hon. Lauri
 Damrell in Dept. 28]

**DECLARATION OF REGINALD
 ANTONIO CHAVIS JR. IN SUPPORT OF
 FINAL APPROVAL OF CLASS
 SETTLEMENT**

Date: September 15, 2023
 Time: 9:00 a.m.
 Dept.: 28

Complaint Filed:	September 29, 2021
FAC Filed:	December 7, 2021
SAC Filed:	December 20, 2022
Trial Date:	None Set

DECLARATION OF REGINALD ANTONIO CHAVIS JR.

I, REGINALD ANTONIO CHAVIS JR., 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 GROCERY OUTLET INC. ("Grocery Outlet" or "Defendant") as a non-exempt, hourly employee.

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

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

5. I brought this lawsuit, on behalf of myself and all other Class Members, against Defendant because I believe that Grocery Outlet failed to pay wages and/or overtime, failed to provide accurate itemized wage statements, and failed to pay timely wages after termination to me and other employees.

6. I first researched attorneys who are very experienced with these types of employment lawsuits. 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. The lawsuit was filed on September 29, 2021.

7. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the Settlement as needed. Additional work in connection with this matter includes providing information to my attorneys regarding my employment with Defendant, staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my attorneys' various communications regarding this matter, making myself available to attend a full-day mediation on May 24, 2022 (though it did not end up going forward on that day); and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of the Class Members.

1 8. I estimate the total time spent in connection with this matter is approximately 25-
2 35 hours.

3 9. I have worked to actively represent the other Class Members and their interests. I
4 have always kept the Class Members interests at heart in this litigation. I am prepared to continue
5 assisting with this litigation and am committed to achieving the best possible results for the
6 Settlement Class.

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

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

16 12. It is my opinion that the settlement agreement provides for a fair and adequate
17 enhancement for me as a Class Representative, in the amount of \$7,500.00. I believe that this is
18 fair and reasonable in light of all of the work that I have performed in my role as Class
19 Representative. As Class Representative, I have actively participated in all stages of the litigation,
20 as detailed above, and have always maintained the best interests of the Settlement Class while
21 performing my Class Representative duties.

22 ///

1 13. It is also my opinion that the Class Representative enhancement is fair, reasonable,
2 and adequate because, in addition to the many hours spent participating in the prosecution of this
3 case, I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we
4 were unsuccessful in this Action. Likewise, I risk the potential stigma of being a Class
5 Representative in a class action labor dispute, which may affect my future employability.

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

8 Executed this 21st day of August, 2023 at Sacramento,
9 California.

DocuSigned by:



REGINALD ANTONIO CHAVIS
JR.

(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 August 23, 2023, I served all interested parties in this action the following documents described as: **DECLARATION OF REGINALD ANTONIO CHAVIS JR. IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

JACKSON LEWIS P.C. Cary G. Palmer cary.palmer@jacksonlewis.com Erika M. Barbara erika.barbara@jacksonlewis.com 400 Capitol Mall, Suite 700 Sacramento, CA 95814 <i>Attorneys for Defendant</i>	D.LAW, INC. Emil Davtyan emil@d.law 400 N. Brand Blvd, 7th Floor Glendale, CA 91203 <i>Attorneys for Plaintiff</i>
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☐ **(BY MAIL)** I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage fully prepaid at Encino, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒ **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.

☒ **BY ELECTRONIC MAIL TRANSMISSION:** I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

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

Executed on August 23, 2023, at Woodland Hills, California.



Michelle Tanzer