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Attorneys for Plaintiff JOANN EICHINGER and the aggrieved employees

[Additional Counsel on Next Page]

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

JOANN EICHINGER, SHELBY L. HIGLEY,
JOHN REID BARNETT, PEGGY GIBSON,
as individuals, on behalf of the State of
California, as a private attorney general,

PLAINTIFFS,

v.

TRACTOR SUPPLY COMPANY;
and DOES 1 thru 50, inclusive,

DEFENDANTS.

CHERI STRINGER, on behalf of herself and
the general public,

Plaintiff,

v.

CASE NO. 23CV010299
[Consolidated with Case No. 23CV002894]

[Case Assigned for All Purposes to Hon. Jill H.
Talley in Dept. 23]

**DECLARATION OF JOANN EICHINGER
IN SUPPORT OF PLAINTIFFS' MOTION
FOR APPROVAL OF REPRESENTATIVE
ACTION SETTLEMENT**

*[Filed concurrently with Plaintiff's Motion for
Approval of Representative Action Settlement;
Declarations of Eric B. Kingsley, Sean Hartranft of
Apex Class Action Administration; and [Proposed]
Order, and Judgment]*

Date: September 12, 2025

Time: 9:00 AM

Dept.: 23

Reservation: A-10299-002

Complaint Filed: July 1, 2022

Actions Consolidated: April 12, 2024

1 TRACTOR SUPPLY COMPANY, a Delaware
2 corporation; and DOES 1 through 50,
3 inclusive,

4 *Defendants.*

Trial Date: June 23, 2025

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I, JOANN EICHINGER, state and declare as follows:

1. I am a competent adult, over the age of eighteen and the named Plaintiff in the matter of Joann Eichinger, et al., as individuals, on behalf of the State of California, as a private attorney general, v. Tractor Supply Company; and DOES 1 thru 50, inclusive, Sacramento County Superior Court, Case No. 23CV010299. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto. I am making this sworn declaration in support of my claims and the claim of my co-workers, and in support of my qualifications as Plaintiff. If called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I worked as a store manager at Defendant's Hanford, California location from August 31, 2015 to July 13, 2021. At the time of my termination, I earned \$19.56/hour. ("Defendant" or "Tractor").

3. In my role as a store manager, Defendant failed to blend bonuses into the proper regular rate of pay. By using a lower, straight hourly rate instead of the higher blended rate, Defendant underpaid my wages, overtime, as well as my meal and rest period premium. Defendant also failed to reimburse me for my cell phone use, failed to issue accurate itemized wage statements, and failed to pay all wages owed to me upon my termination.

4. I have spent significant time throughout this Action working with PAGA Counsel. Before filing this action, in July 1, 2022, I researched and identified Counsel that I believed could best represent the interests of the PAGA Employees. I also assisted the attorneys with investigation and gathering of information including discussing my work experience and the experience of others that I had observed while working for Tractor and provided all relevant employment documents in my possession. I also was deposed by Defendant on September 11, 2024. I also participated in reviewing and verifying discovery responses. In addition, I made myself available for two full-day mediations on June 26, 2023, and December 23, 2024. I actively participated in the discussions with the PAGA Counsel for mediation and shared my knowledge and insights in order to help the PAGA Employees obtain a favorable settlement.

1 5. Although I did not keep contemporaneous time records, I estimate I spent
2 approximately 25-30 hours on these activities over the last three years.

3 6. Throughout the entirety of this litigation, I have maintained regular contact with
4 PAGA Counsel and assisted in any way possible by providing information and making myself
5 available as needed.

6 7. I was aware that by helping to initiate this lawsuit, my name would become known
7 and it was possible that my involvement in this matter could make it more difficult for me to obtain
8 employment in this field. Regardless, I believed it was important to proceed with this matter on
9 my behalf and on behalf of all others who were subject to the same problems during their
10 employment with Defendant.

11 8. Based upon my participation in this case, I understand the merits of this settlement
12 and I strongly support the settlement and believe it is fair and reasonable, and in the best interest
13 of the PAGA Employees. I believe this Settlement will benefit the PAGA Employees.

14 9. It is my opinion that a fair and adequate enhancement for me as a Plaintiff is
15 \$10,000. I believe that it is fair and reasonable in view of all of the work I have performed in my
16 role as a named Plaintiff. As Plaintiff, I actively participated in all stages of the litigation as detailed
17 above and have always maintained the best interest of the PAGA Employees while performing my
18 named Plaintiff duties.

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 7 day of July , 2025 at Huntsville ,
22 Arkansas. (City)

23
24 

25 Joann Eichinger
26 Declarant
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(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 July 23, 2025, I served all interested parties in this action the following documents described as: **DECLARATION OF JOANN EICHINGER IN SUPPORT OF PLAINTIFFS' MOTION FOR APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

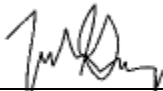
SEE ATTACHED SERVICE LIST

[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] (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 above email address(es).

[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 July 23, 2025, at West Hollywood, California.



Taylor Gregg

SERVICE LIST

*Joann Eichinger, et. al v. Tractor Supply Company
Superior Court of California, County of Sacramento*

*Case No: 23CV010299
[Consolidated with Case No. 23CV002894]*

ABRAMSON LABOR GROUP WILLIAM ZEV ABRAMSON wza@abramsonlabor.com 1700 W. Burbank Blvd. Burbank, CA 91506 Attorneys for Plaintiff JOANN EICHINGER and all aggrieved employees MOON LAW GROUP, PC Kane Moon kmoon@moonlawgroup.com Daniel J. Park dpark@moonlawgroup.com Michael Citrin mcitrin@moonlawgroup.com 725 S. Figueroa St., Suite 3100 Los Angeles, California 90017 Attorneys for Plaintiffs SHELBY L. HIGLEY, JOHN REID BARNETT, PEGGY GIBSON, and all aggrieved employees	AKERMAN LLP Felipe Gomez Mishell Taylor felipe.gomez@akerman.com mishell.taylor@akerman.com 633 West Fifth Street, Suite 6400 Los Angeles, California 90071 Attorneys for Defendant TRACTOR SUPPLY COMPANY SETAREH LAW GROUP Shaun Setareh shaun@setarehlaw.com Jose Maria D. Patino, Jr. jose@setarehlaw.com Tyson Gibb tyson@setarehlaw.com calendar@setarehlaw.com 9665 Wilshire Boulevard, Suite 430 Beverly Hills, California 90212 Attorneys for Plaintiff CHERI STRINGER and the aggrieved employees
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