

Kane Moon (SBN 249834)
 E-mail: kmoon@moonlawgroup.com
 Daniel J. Park (SBN 274973)
 E-mail: dpark@moonlawgroup.com
 Benjamin H. Davidson (SBN 338789)
 E-mail: h davidson @moonlawgroup.com

MOON LAW GROUP, PC
 725 South Figueroa Street, 31st Floor
 Los Angeles, California 90017
 Telephone: (213) 232-3128
 Facsimile: (213) 232-3125

Attorneys for Plaintiff John Reid Barnett

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

JOHN REID BARNETT, individually, and on
 behalf of all others similarly situated,

Plaintiff,

v.

TRACTOR SUPPLY COMPANY, INC., a
 California corporation; and DOES 1 through 10,
 inclusive,

Defendants

Case No.: 23CV010299

[Consolidated with Case No. 23CV002894]

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

COMPLEX ACTION

**DECLARATION OF PLAINTIFF JOHN
 REID BARNETT IN SUPPORT OF
 PLAINTIFFS' MOTION FOR APPROVAL
 OF REPRESENTATIVE ACTION
 SETTLEMENT**

*[Filed concurrently with Declarations of Eric
 B. Kingsley, Kane Moon of Moon Law Group,
 Shaun Setareh of Setareh Law Group, Apex
 Class Action Administration, and Plaintiffs
 Joann Eichinger, Shelby L. Higley, John Reid
 Barnett, Peggy Gibson, Cheri
 Stringer, in Support of Plaintiffs' Motion for
 Approval of Representative Action Settlement;
 [Proposed] Order, and Judgment]*

FINAL APPROVAL HEARING

Date: September 12, 2025

Time: 9:00 AM

Dept.: 23

Reservation: #A-10299-002

DECLARATION OF JOHN REID BARNETT

I, JOHN REID BARNETT, declare as follows:

1. I am the named Plaintiff in this case.

2. I am a former employee of Defendant TRACTOR SUPPLY COMPANY, INC. (“Defendant”). As such, I have personal knowledge of, or believe and am informed of, the facts stated herein. If called as a witness, I could and would testify competently to the following:

BACKGROUND OF EMPLOYMENT

3. I worked for Defendant as an Assistant Store Manager from approximately April 2017 to November 2021. I was employed by Defendants in a non-exempt position during the alleged Class Period.

4. Throughout my employment with Defendants, I believed its wage and hour practices placed employees, including me, at a disadvantage. I was not being paid at the regular rate for time worked because of Defendant’s improper use of bonus pay calculations.

5. Throughout my employment with Defendants, I believed its wage and hour practices placed employees, including me, at a disadvantage. I was not being paid at the regular rate for time worked because of Defendant’s improper bonus pay calculations.

6. Throughout my employment with Defendants, I did not receive compensation for required use of my personal cellphone in order to do my job.

7. Throughout my employment with Defendants, I believed its wage and hour practices also affected other hourly employees of Defendants because such employees were also not being paid for hours they were required to work off the clock, rather than actual time worked, and were not compensated for required use of their personal cellphones. This was true for other hourly employees who worked during the same or different shifts and on the same or different days.

8. I believe Defendants failed to compensate me and other hourly employees for all time worked, as well as failed to provide legally compliant meal periods and rest breaks. I therefore believe me and other hourly employees were subjected to the same or similar illegal wage and hour practices.

9. I brought this representative action on behalf of myself and all other employees who are or were classified as non-exempt during the relevant time period.

10. I believe the violations alleged in this case impacted not only me but all other aggrieved employees.

11. I believe that I have no conflicts of interest with other Aggrieved Employees.

12. Before initiating this action, my attorneys advised me that, if I were to become named plaintiff, I would have significant responsibilities to both the Aggrieved Employees and the Court. I understood and continue to understand that my responsibilities include responding truthfully, completely and promptly to any information requests made by my attorneys; making myself available for any meetings, proceedings or other court hearings at which I am needed; and, above all, placing the interests of the Aggrieved Employees above my own.

13. I brought this class action in full recognition and acceptance of my responsibilities as a named plaintiff, and I continue to appreciate the importance of my responsibilities as the settlement process progresses.

14. Throughout and prior to initiating this case, I engaged in lengthy conversations with my attorneys about all aspects of the case; identified relevant witnesses and provided several documents to my attorneys, including policy documents and records I had received from Defendant during my employment; promptly responded to all of my attorneys' inquiries about my employment with Defendant; requested regular case updates from my attorneys; asked my attorneys questions so that I understood how everything worked; discussed the mediation and proposed settlement terms with my attorneys; and reviewed and signed the proposed Settlement. In total, I have spent approximately forty hours working on this case.

15. I worked with my attorneys for multiple days to respond to a full round of formal discovery propounded by Defendant. I met with one attorney for several hour-long sessions over multiple days to be able to prepare responses to the discovery requests. I spent days with my attorneys to prepare for and appear at a full-day deposition. This required me to miss multiple days of work.

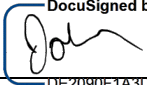
16. I understand the PAGA Action Settlement Agreement provides a Class Representative Enhancement Award to me in the amount of \$10,000.00. I believe this amount is fair compensation for initiating and helping to prosecute this case, for my effort and approximately forty hours of work on this case, and for the risks I undertook with respect to agreeing to be the named Plaintiff in this case, including the negative impact this role may have on my future employability.

17. I am glad that I had the opportunity to represent the Aggrieved Employees in this lawsuit and that I was able to recover money through a settlement for them.

18. I believe the Settlement is fair, adequate and reasonable, and for this reason, I would recommend that the Court approve it.

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

Executed on July 3, 2025, at West Covina, California.

DocuSigned by:


John Reid Barnett

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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 PLAINTIFF JOHN REID BARNETT 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:

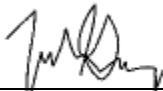
SEE ATTACHED SERVICE LIST

[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	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
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	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