

BROCK & GONZALES, LLP

6701 CENTER DRIVE WEST, STE. 610

LOS ANGELES, CA 90045

Tel: (310) 294-9595

Fax: (310) 961-3673

D. AARON BROCK, STATE BAR NO. 241919

DANIELLE L. GRUPPCHANG, STATE BAR NO. 313881

Attorneys for Plaintiff

Rachel Gillett

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF RIVERSIDE

Rachel Gillett, individually, and on
behalf of other members of the general
public similarly situated, and on behalf
of other aggrieved employees pursuant
to the California Private Attorneys
General Act;

Plaintiff,

vs.

The Pet Patrol LLC, a California limited
liability company; and DOES 1-50,
inclusive,

Defendants.

Case No.: CVRI2201461

Honorable Harold W. Hopp
Department 1

**DECLARATION OF RACHEL GILLETT
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL**

[Plaintiff's Unopposed Motion for Preliminary
Approval of Class Action Settlement;
Declaration of Proposed Class Counsel
(Danielle L. GruppChang); and [Proposed]
Order filed concurrently herewith]

Date: August 14, 2023
Time: 8:30 am
Department: 1

Complaint Filed: April 11, 2022
Trial Date: None Set

DECLARATION OF RACHEL GILLETT

I, Rachel Gillett, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case, and I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendant The Pet Patrol, LLC ("Pet Patrol") from approximately May 14, 2018 to approximately November 2021 in the non-exempt, hourly-paid position of groomer. I had concerns regarding Pet Patrol's treatment of their employees, including myself, so I spent about 5 hours researching California employment laws and looking for the right employment law firm to schedule a consultation. After speaking to multiple attorneys, I spoke to Danielle GruppChang at Brock & Gonzales, LLP and spoke to her for approximately 4 hours about my experiences at Pet Patrol, the applicable California laws, and what to expect during a potential case. Based on our conversation, I decided to retain Brock & Gonzales, LLP to help me file a lawsuit against Pet Patrol on behalf of the other employees that I believe were not treated fairly or paid all of their earned wages by Pet Patrol.

3. After retaining Brock & Gonzales, LLP, I spent about 9 hours discussing the details of my experiences working at Pet Patrol, the other theories involved in a potential lawsuit, class action and representative Private Attorneys General Act action lawsuits, and what my responsibilities would be as a named representative and PAGA representative.

4. After the lawsuit was filed, I estimate I spent at least 18 hours communicating with my attorneys. I regularly called my attorneys to get updates and provide any additional information I had obtained. I also made myself available to answer texts and emails and to have scheduled conferences with my attorneys. I answered all of my attorneys' questions about Pet Patrol to the best of my ability and did my best to seek out the information if I did not know the answer. I provided information about other non-exempt, hourly-paid employees, including but not limited to their job titles and job duties, policies which effected all employees, and what I had witnessed other employees experience at work. I described Pet Patrol's practices and policies for my attorneys at length. I spent at least 85 hours on my own looking for additional documents and

1 gathering information to provide to my attorneys about Pet Patrol.

2 5. I made myself available all day on the day of the mediation and spent about 4
3 hours beforehand discussing what a potential settlement of the action would entail with my
4 attorneys. I spent about 6 hours reviewing the settlement agreement and about 8 hours asking
5 questions and discussing the potential settlement with my attorneys before signing the settlement
6 agreement.

7 6. I answered all of my attorneys' questions as well as I could, provided them with
8 all of the relevant information I had as well as all of the documentation I could gather, researched
9 each aspect of the lawsuit to the best of my ability, and did everything else my attorneys asked of
10 me. I believe I did everything I could to get a fair result for the other employees and the state of
11 California. I think everything I did helped to get the result obtained in this case.

12 7. I respectfully request that the Court approve and award me a Class Representative
13 Service Payment in the amount of \$10,000.00 for my efforts and active participation in the case.
14 Taking into consideration the time that I dedicated to this case, I believe that this amount is
15 reasonable.

16 8. I am not related to anyone associated with Brock & Gonzales, LLP.

17 9. I have not entered into any undisclosed agreements or received any undisclosed
18 compensation in this case.

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 on Jul 31, 2023, at Riverside, California.

22 

23 Rachel Gillett (Jul 31, 2023 15:39 PDT)

24 Rachel Gillett

2023.07.28_ Gillett Decl.

Final Audit Report

2023-07-31

Created:	2023-07-31
By:	Jessica Sanchez (jbs@brockgonzales.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA95Gy415W44zwwPt-w3ApW0HTTXmi2Mf6

"2023.07.28_ Gillett Decl." History

-  Document created by Jessica Sanchez (jbs@brockgonzales.com)
2023-07-31 - 7:50:19 PM GMT
-  Document emailed to rgillett2008@sbcglobal.net for signature
2023-07-31 - 7:50:48 PM GMT
-  Email viewed by rgillett2008@sbcglobal.net
2023-07-31 - 9:36:26 PM GMT
-  Signer rgillett2008@sbcglobal.net entered name at signing as Rachel Gillett
2023-07-31 - 10:39:08 PM GMT
-  Document e-signed by Rachel Gillett (rgillett2008@sbcglobal.net)
Signature Date: 2023-07-31 - 10:39:10 PM GMT - Time Source: server
-  Agreement completed.
2023-07-31 - 10:39:10 PM GMT