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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF SAN BERNARDINO**

11
12 ANTWANETTE KING, as an aggrieved
employee pursuant to the Private Attorneys
13 General Act ("PAGA"), on behalf of the State of
California and other non-party Aggrieved
14 Employees,

15 Plaintiff,

16 vs.

17 RADC ENTERPRISES, INC., a California
corporation; ANABI CONVENIENCE
18 CENTERS, INC., a California corporation;
ANABI OIL CORPORATION, a California
19 corporation; C.A.R. ENTERPRISES, INC., a
California corporation; EDE ENTERPRISES,
20 INC., a California corporation; HOLLINS
MANAGEMENT GROUP, INC., a California
21 corporation; JBL OIL CORPORATION, a
California corporation; JV S&T, INC., a
22 California corporation; NMSO, INC., a
California corporation; QUICKBITES, INC., a
23 California corporation; S & M OIL
CORPORATION, a California corporation;
24 TMSO, INC., a California corporation; and
DOES 1 through 10, inclusive,

25 Defendants.
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Case No. CIVSB2221711

Assigned to the Hon. Joseph T. Ortiz

**DECLARATION OF ANTWANETTE KING
IN SUPPORT OF MOTION FOR COURT
APPROVAL OF THE PARTIES' PAGA
SETTLEMENT**

Date: July 25, 2024

Time: 1:30 p.m.

Place: Department S17

Complained Filed: September 30, 2022

Trial Date: None Set

DECLARATION OF ANTWANETTE KING

I, Antwanette King, hereby declare as follows:

1. I am over eighteen years old and unless the context indicates otherwise, I have personal knowledge of the following facts, and if called as a witness, I could and would testify competently to them. I am the named plaintiff in the above-captioned action. I make this declaration in support of the Motion for Court Approval of the Parties' PAGA Settlement.

2. I was employed by Defendants RADC Enterprises, Inc., et al. (collectively, "Defendants") as an Assistant Manager (an hourly paid, non-exempt position) from approximately January 2022 to May 2022. I worked for Defendants at their convenience stores located at 5345 Hazel Avenue, Fair Oaks, California 95628 and 2325 Sunset Boulevard, Rocklin, California 95765.

3. I decided to file this lawsuit because I had a number of grievances against Defendants stemming from their labor policies. These grievances are set forth in detail in the operative Complaint and my letter to California Labor and Workforce Development Agency ("LWDA").

4. Prior to filing the action, my attorneys and I had multiple conferences about the factual bases for the claims that I wanted to pursue against Defendants.¹ During those conferences, my attorneys provided me with an overview of how those claims would be litigated, and generally educated me about the nature of complex/representative litigation and my role as the representative Plaintiff.

5. After retaining my attorneys, I spent considerable time on the phone discussing the facts of my case with my attorneys. I discussed the facts related to my employment with Defendants, including discussing my job duties and responsibilities, my job position, the hours and days I worked, and how I was compensated.

6. When I agreed to represent the LWDA as a deputized private attorney general, I understood it was my duty to be readily available and to participate actively in this case. I knew that I would be required to review documents, search for documents and produce them to my attorneys, answer written questions, potentially answer oral questions and testify truthfully under oath, and be available to

¹ Although the preservation of my attorney-client privilege requires that I refrain from revealing the specifics of my communications with my attorneys, I understand that the privilege is not waived by stating generally the matters that I have discussed with my attorneys.

1 appear in court, if necessary.

2 7. I understood that I needed to maintain awareness of the status and progress of the lawsuit.

3 8. My attorneys provided me with a draft of the Complaint for my review and approval. I
4 closely reviewed the Complaint to ensure accuracy and completeness. Following the filing of the
5 Complaint, I collaborated with my attorneys on the prosecution of my claims, and I regularly contacted
6 my attorneys to stay current on the status of the litigation, and to discuss my attorneys' progress in
7 prosecuting the claims.

8 9. I have worked to the best of my ability to prosecute this action on behalf of the LWDA,
9 always considering the interests of the LWDA just as I would consider my own interests. I believe PAGA
10 actions are an important tool to assure compliance with the Labor Code.

11 10. Since initiating this lawsuit until now, I have kept aware of the status of the lawsuit and
12 provided my attorneys with information used by them in the litigation. I have spent large amounts of time
13 and effort pursuing my claims and the claims of the other employees from the time I retained my attorneys
14 to the present date.

15 11. I have carefully reviewed the terms of the proposed settlement. My attorneys explained
16 the specifics of how the settlement would work and I accepted the settlement only after I had spent time
17 evaluating the proposed outcome to assure that it was fair. Based on my attorneys' evaluation and
18 recommendation, and my own review, I believe the settlement is fair and reasonable in light of PAGA's
19 policies and purposes.

20 12. In summary, over the course of this litigation I have spent a significant amount of time
21 conferring and working with my attorneys on the prosecution of my claims and evaluating the settlement
22 and related documents. I estimate that I have spent between 25 and 35 hours assisting my attorneys in the
23 prosecution of this lawsuit.

24 13. Throughout this case, I have not sought individual benefits from the lawsuit. Rather, I
25 maintained this lawsuit because I wanted to hold Defendants accountable for their unlawful conduct. I
26 believe that I have fulfilled my responsibilities, and I will continue to fulfill those responsibilities, to the
27 best of my ability, until the conclusion of the case.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on [Date] Antwanette king, at [City] 6/24/2024, California.

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