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Attorneys for Plaintiff KHALED ALRIFAI

SUPERIOR COURT OF CALIFORNIA
COUNTY OF COUNTY OF SAN BERNARDINO

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

Plaintiff,

vs.

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

Defendants.

Case No. CIVSB2221711

*[Assigned for all purposes to Honorable Joseph
T. Ortiz, Dept. S17]*

**DECLARATION OF PLAINTIFF KHALED
ALRIFAI IN SUPPORT OF PLAINTIFFS’
MOTION FOR COURT APPROVAL OF
THE PARTIES’ PAGA SETTLEMENT**

Date: July 25, 2024
Time: 1:30 p.m.
Place: Department S17

Complaint Filed: September 30, 2022
Trial Date: None Set

1 **DECLARATION OF PLAINTIFF KHALED ALRIFAI IN SUPPORT OF PLAINTIFFS'**
2 **MOTION FOR COURT APPROVAL OF THE PARTIES' PAGA SETTLEMENT**

3 I, Khaled Alrifai, hereby declare as follows:

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

7 2. I was employed by Defendants from on or about September 2019 until April 12,
8 2022. I worked under the same policies and procedures and suffered the same violations as other
9 aggrieved employees.

10 3. My decision to bring the case was not taken lightly as I understood that I assumed
11 considerable potential reputational and financial risk in bringing the lawsuit. However, after
12 consulting with my attorneys regarding my claims and PAGA lawsuits in general, and what it meant
13 to be a class representative, in my capacity as an employee of Defendants, I felt that I was in a
14 unique position to offer insight as to Defendants' wage and hour practices. I understand that I
15 assumed considerable potential reputational and financial risk in bringing the lawsuit, however, I
16 wanted to ensure that Defendants paid me and other employees what was owed to us and that
17 Defendants stopped its practice of not properly compensating its employees for all hours worked and
18 non-compliant meal and rest breaks, and of failing to reimburse its employees for business expenses.

19 4. In total I have spent approximately twenty-one (21) hours working on this case with
20 my counsel since it was initially filed in 2023. This time involved meeting with my counsel on
21 numerous occasions to discuss the case, the evidence involved, reviewing documents produced by
22 my former employer, and in order to prepare for mediation and discussing the motions that are
23 necessary for approval of the case with my counsel.

24 5. Since becoming involved in this case, I have spent a significant amount of time
25 meeting with my attorneys concerning the case and fulfilling my responsibilities as a class
26 representative, which included gathering documents concerning my employment with Defendants,
27 reviewing documents with my attorneys and answering their questions, answering questions and
28 providing guidance regarding the duties of hourly, non-exempt employees, and helping develop a

2.

1 strategy as to what documents to obtain from Defendants. I routinely checked in with my attorneys
2 and their staff to make sure that they had all of my most current information and any additional
3 information that I had obtained from speaking with other employees.

4 6. Throughout the case over the last few years, I was available to answer any questions
5 my attorneys had, and I was available to speak and meet with my attorneys whenever they needed
6 me. I responded to them as quickly as possible and gave them as much information as I could. I
7 spent many hours speaking with my attorneys about the case, identifying potential witnesses,
8 providing my attorneys with documents and information for the purposes of discovery, and also
9 describing documents, policies, practices, and procedures of Defendants.

10 7. As far as the settlement is concerned, I was available to review documents and
11 answer any questions my attorneys had. I spent extensive time assisting my attorneys to prepare for
12 mediation in this matter and to review the documents and data Defendants produced in connection
13 to mediation. I spent additional time reviewing the settlement agreement with my attorneys and
14 asking questions and discussing the potential settlement before signing the agreement

15 8. I also signed a general release which does not apply to the other employees of
16 Defendants that are members of the aggrieved employee class, who are only releasing their right to
17 seek penalties under PAGA for violation of the specific labor code violations listed in the settlement
18 agreement.

19 9. I believe that I have done everything that my attorneys have asked of me and have
20 tried, to the best of my ability, to represent the class. I understand, and willingly accepted my
21 fiduciary obligations to prosecute this case on behalf of the employees that make up the absent class
22 members.

23 10. I believe my efforts helped to get the exceptional result obtained in this case, and as a
24 representative Plaintiff, I respectfully request that the Court award me a service award payment in
25 the amount of ten thousand dollars (\$10,000.00) for my active participation in this case.

26 11. Taking into consideration the time that I have dedicated to this case, and the risk that
27 I have taken, (because of the possibility that my current employer, and future employers, might
28 discover that I have served as the lead plaintiff in this case and retaliate against me; and because I

1 could be liable for costs if we were unsuccessful in this case); I believe that this amount is
2 reasonable.

3 12. To date, I have not received any personal benefit from my participation in this case,
4 but I chose to serve as a named plaintiff because I believe strongly that it is necessary to stand up for
5 other employees besides myself.

6 13. I am not related to anyone associated with my attorneys, Haig B. Kazandjian
7 Lawyers, APC.

8 14. I am aware of the Joint Prosecution and Attorney Fee Split Agreement between Haig
9 B. Kazandjian Lawyers, APC and Capstone Law APC and consented to the agreement in writing on
10 June 15, 2023.

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

13 Executed this on June 26, 2024, at Los Angeles, California.

14 *KHALED ALRIFAI*

15 Khaled Alrifai
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