

Brian J. Mankin, Esq. [CSB No. 216228]
brian@lmlfirm.com
Peter J. Carlson, Esq. [CSB No. 295611]
peter@lmlfirm.com
LAUBY, MANKIN & LAUBY LLP
5198 Arlington Avenue, PMB 513
Riverside, CA 92504
Tel: (951) 320-1444 | Fax: (951) 320-1445

Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

AARON VAZQUEZ, RAHMAN
PINCKNEY, VISAVANH
SOKANTHONG, and MICHELLE
MAESTAS, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiffs,

vs.

WAY.COM, INC., a Delaware
Corporation; and DOES 1 through 20,
inclusive;

Defendants.

Case No.: CIVSB2216363

*[Assigned to Hon. Kevin Lee, Dept S26, for all
purposes]*

**DECLARATION OF PLAINTIFF RAHMAN
PINCKNEY**

I, Rahman Pinckney, state and declare:

1. I am a Plaintiff in the above captioned action and have personal knowledge of all matters stated herein and could competently testify thereto. I make this declaration in support of the motion for preliminary approval of the class action settlement. I believe that the settlement is fair and reasonable and constitutes a fair resolution of the claims alleged.

2. When I was employed at Way.com, there were several issues with how I was treated and paid. For that reason, I started researching my rights under California law and contacted my eventual attorneys (Lauby, Mankin & Lauby). I then learned that there was

1 already a pending class action case that covered the issues I had at the company – and I was
2 given the option of adding myself to the class action to pursue the claims and try to help all of
3 the employees. But I understood that, if I was added to the class action, I would be required to
4 put the interests of the class ahead of my own and would not be able to attempt to maximize my
5 individual recovery (since I would be required to consider the interests of all class members
6 above my own personal interests). I was also concerned that, if I was added to the class action, it
7 might impact my ability to find future jobs because my name would be attached to this case as a
8 whistleblower, and future employers might hold that against me. Despite these risks, I chose to
9 be added to the class action to help all employees.

10 3. I respectfully request that the Court approve the agreed-upon service award for
11 the following reasons.

12 4. First, in agreeing to be added to the class action, I agreed to set aside my personal
13 interests and to put the interests of the class ahead of my own. In doing so, and by successfully
14 bringing this case as a class action, I helped to obtain a highly beneficial settlement for the class
15 members.

16 5. Second, as part of agreeing to put the interests of the Class first, I also had to
17 agree – as part of the settlement – to waive all of my claims against the company, which other
18 employees were not required to do.

19 6. Third, I have spent substantial time working on this case – at least 60 hours
20 engaged in activities to benefit the class. I have been an active participant in this litigation and
21 have assisted my attorneys in numerous ways, including helping to explain and discuss the
22 company's practices and their general practices and procedures, locating and analyzing company
23 documents, and communicating with other class members. These efforts occurred through
24 numerous telephone conferences, letters, emails, and text communications. I also assisted in
25 preparation for mediation and the litigation and discovery afterwards. My work also continued
26 after settlement, as I reviewed settlement agreements and other settlement documents, and
27 continued communication with Class Counsel and other class members during the settlement
28 approval processes.

7. Fourth, agreeing to join the class action came with a major financial risk because, if we lost the case, I would be required to pay the company's costs, which could be over \$10,000, and there was a chance they could try to make me pay their attorneys' fees as well.

8. Fifth, by joining and participating in this class action, I undertook significant risks and stresses at a high emotional cost without any guarantee of success. For example, this lawsuit and being a whistle blower was stressful on a day-to-day basis as I have constantly worried about the risk that this case could impact my ability to find future jobs. And this stress/risk lasted for the entire case, and I'm still worried it may make it hard to find a job in the future.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on Aug 28, 2026, at Riverside, California.

By:


Rahman J P

Rahman J Pinckney (Aug 28, 2026 11:51:21 PDT)

Rahman Pinckney