

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
VISAVANH SOKANTHONG**

I, Visavanh Sokanthong, 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 decided to join this case, which was pending as a class action, I understood that I had specific burdens as the “Class Representative,” which included: (a) representing the interests of all class members, (2) considering the interests of all class members

1 above my own personal interests, (3) participating actively in the lawsuit, including potential
2 testimony at deposition and trial, and keeping generally aware of the status and progress of the
3 lawsuit. Moreover, I understood that any resolution of the lawsuit is subject to court approval
4 and must be designed in the best interests of the class as a whole.

5 3. Since being added to this action on behalf of the proposed class, I believe that I
6 have more than adequately performed my duties as a class representative. I have been an active
7 participant in this litigation, including assisting my attorneys in various ways and making myself
8 available when needed. For example, I have assisted my attorneys by compiling and analyzing
9 substantial documentation regarding the claims in this case. I have also helped to explain and
10 discuss the company's practices and their general practices and procedures, locating and
11 analyzing company documents, among others. I have also reviewed all settlement documents and
12 believe that this settlement is fair for the class. Finally, I will continue to take all steps necessary
13 to finalize this settlement and obtain court approval.

14 4. I have no conflicts with the proposed class members, and I am an adequate and
15 typical class representative since I was subjected to the same company-wide practices in terms of
16 payment of wages, meal and rest breaks, among other claims, and will continue to assist with the
17 litigation and prosecute the case on behalf of the other employees.

18 5. I respectfully request that the court preliminarily approve the service award. As
19 outlined above, I have performed substantial services for the Class and helped obtain a highly
20 beneficial settlement for my fellow employees. At the final approval stage, I will submit an
21 additional declaration setting forth all the work I did for this case, including an estimated number
22 of hours spent assisting the Class and my attorneys.

23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct. Executed on Apr 1, 2026, at Baldwin Park, California.

25 By: 
26 V Sokanthong (Apr 1, 2026 13:19:37 PDT)
27 Visavanh Sokanthong
28