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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
MICHELLE MAESTAS**

I, Michelle Maestas, 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. I had several issues with how I was treated and paid at Way.com, and that is specifically why I started researching my rights under California law and contacted my eventual attorneys (Lauby, Mankin & Lauby). I initially brought a separate individual case against

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

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

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

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

20 6. Third, I have spent substantial time working on this case – at least 40 hours
21 engaged in activities to benefit the class. I have been an active participant in this litigation and
22 have assisted my attorneys in numerous ways, including helping to explain and discuss the
23 company's practices and their general practices and procedures, locating and analyzing company
24 documents, and communicating with other class members. These efforts occurred through
25 numerous telephone conferences, letters, emails, and text communications. I also assisted in
26 preparation for negotiations and helped obtain a positive result for the class. My work also
27 continued after settlement, as I reviewed settlement agreements and other settlement documents,
28 and continued communication with Class Counsel and other class members during the settlement

1 approval processes.

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

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

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

12
13 By:


Michelle Maestas (Aug 28, 2026 11:37:58 PDT)

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