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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 AARON
VAZQUEZ**

I, Aaron Vazquez, 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. During my employment with Way.com, I thought that there were issues with my pay and other aspects of my employment. Because of these issues, I started researching California law and contacted attorneys regarding how I was treated.

1 3. I then contacted my attorneys and understood that I had two options: (1) I could
2 bring a class action to help all of the employees, but I would have to put their interests ahead of
3 my own, or (2) I could bring my individual case and claims and attempt to maximize my
4 individual recovery. This decision was very difficult because I wanted to maximize my
5 individual recovery, but I also wanted to help everyone else that was wronged by the company.
6 And, if I brought a class action, I was worried that I might get labeled as a whistleblower, which
7 might make it hard to find a job in the future. In the end, I decided that – despite the risks – it
8 was important to bring these claims as a class action to hold the company accountable for how
9 they treated their employees.

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

12 5. First, I have spent substantial time working on this case – at least 80 hours
13 engaged in activities to benefit the class over the 4 years since we filed the class action. I have
14 been an active participant in this litigation and have assisted my attorneys in numerous ways,
15 including helping to explain and discuss the company’s practices and their general practices and
16 procedures, locating and analyzing company documents, and communicating with other class
17 members. These efforts occurred through numerous telephone conferences, letters, emails, and
18 text communications. I also assisted in preparation for mediation and litigation and discovery
19 thereafter. My work also continued after settlement, as I reviewed settlement agreements and
20 other settlement documents, and continued communication with Class Counsel and other class
21 members during the settlement approval processes.

22 6. Second, I respectfully request that the Court approve the agreed-upon service
23 award because I agreed to set aside my personal interests and to put the interests of the class
24 ahead of my own. In doing so, and by successfully bringing this case as a class action, I helped to
25 obtain a highly beneficial settlement for the class members.

26 7. Third, as a condition of this class action settlement, I was required to release and
27 waive all possible individual claims against the company – something that none of the other class
28 members were required to give up.

8. Fourth, by bringing this class action, I undertook significant risks and stresses at a high emotional cost without any guarantee of success. For example, filing 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.

9. Fifth, bringing this case also came with a major financial risk because, if I 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.

10. Therefore, I respectfully request that the Court award the full requested service award since that amount is justified based on the facts above.

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:  Aaron Vazquez (Aug 28, 2026 10:48:39 PDT)
Aaron Vazquez