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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
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. During my employment at Way.com, I was troubled by certain aspects of how I was paid and how I was treated. For that reason, I started researching my rights under California law and contacted my eventual attorneys (Lauby, Mankin & Lauby). I then learned that there

1 was 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, I have spent substantial time working on this case – at least 60 hours
13 engaged in activities to benefit the class. I have been an active participant in this litigation and
14 have assisted my attorneys in numerous ways, including helping to explain and discuss the
15 company’s practices and their general practices and procedures, locating and analyzing company
16 documents, and communicating with other class members. These efforts occurred through
17 numerous telephone conferences, letters, emails, and text communications. I also assisted in
18 discovery and other litigation, and my work continued after settlement was reached, as I
19 reviewed settlement agreements and other settlement documents, and continued communication
20 with Class Counsel and other class members during the settlement approval processes.

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

24 6. Third, in agreeing to be added to the class action, I agreed to set aside my
25 personal interests and to put the interests of the class ahead of my own. In doing so, and by
26 successfully bringing this case as a class action, I helped to obtain a highly beneficial settlement
27 for the class members.
28

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 Baldwin Park, California.

By:


V Sokanthong (Aug 28, 2026 10:33:45 PDT)
Visavanh Sokanthong