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Attorneys for Plaintiff JOVAN NEWLAND,
individually, and on behalf of others similarly
situated

SUPERIOR COURT OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

JOVAN NEWLAND, individually, and on
behalf of all others similarly situated,

Plaintiff,

vs.

WJD RESTAURANT GROUP, LLC, a
California Limited Liability Company; and
DOES 1through 50, inclusive,

Defendants.

Case No. 24STCV10446

*[Assigned for all purposes to the Honorable
Laura A. Seigle, Department 7]*

**DECLARATION OF JOVAN NEWLAND
IN SUPPORT OF PLAINTIFF’S
MOTION FOR FINAL APPROVAL**

Action Filed: April 25, 2024
Trial Date: None set

DECLARATION OF JOVAN NEWLAND

I, Jovan Newland, declare as follows:

1. I am an individual over the age of 18. I am the named plaintiff in the above-reference action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I have been employed by Defendant WJD Restaurant Group, LLC (“Defendant”) as a server since November of 2021. During this time I have worked at events at which a “service appreciation” was paid by the customers but no portion of it was distributed to me.

3. I understand that I am acting as a representative for the Class. As class representative, I understand that it is my responsibility to act in the best interest of the Class and not my own. I have not put my own interests ahead of that of the Class, and that I have not settled out my claims separately or independently from the Class. Moreover, I am not aware of any conflicts that exist between my interest and the interests of the Class that would impair or affect my ability to serve as representative for the Class.

4. I have and continue to be willing to assist in the investigation of this matter as well as make myself available for trial or any further proceeding in this matter as required to represent the interests of the Class.

5. I have discussed the terms of the settlement with my attorneys, and based on the information provided, I believe the settlement to be fair, adequate, and reasonable for myself and for the entire Class.

6. Prior to and subsequent to the filing of the lawsuit against Defendant, I regularly conferred with my attorneys to discuss the status of the case, offer my input, and assisted my attorneys in gathering evidence that supported the class claims. Beyond working with my attorneys I also reviewed documents in my own possession, reviewed case-related documents, and spoke with former co-workers. I also provided documents and other relevant information in order to assist my attorneys in this matter. In total I estimate that I spent approximately 30 hours performing tasks related to this case.

7. I am aware in cases like mine, that there is the risk that if I do not win my case, then I could be liable for the fees and costs of Defendant. I accepted that risk in this case, which I understood could be substantial.

8. I also understood that filing this lawsuit is a public record and I accepted that burden. As such, I risked my future employment in order to bring this action. Moreover, this lawsuit, which is a public record, is something that potential employers can look into, and which may cause a negative impact of my employment prospects.

9. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive accomplishment of this lawsuit. I understand that hundreds of individuals will benefit in this lawsuit because of the actions that I have taken.

10. I understand that because of my actions, many others have benefited from this case. I feel that I took upon myself the risk of this lawsuit and achieved a result for my other former co-workers who did not have to file suit.

11. I am aware of and have agreed in writing to the fee-sharing agreement between my attorneys.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 7/21/2026, at Los Angeles, California.

Signed by:



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Jovan Newland