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Attorneys for Plaintiff, CAYA RODRIGUEZ as
an aggrieved employee, and on behalf of all other
aggrieved employees under the Labor Code
Private Attorneys' General Act of 2004,

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

CAYA RODRIGUEZ, as an aggrieved
employee, and on behalf of all other
aggrieved employees under the Labor Code
Private Attorneys' General Act of 2004,

Plaintiff,

v.

RAISING CANE'S USA, L.L.C., a California
limited liability company; RAISING CANE'S
RESTAURANTS, L.L.C., a California limited
liability company; and DOES 1 through 100,
inclusive,

Defendants.

CASE NO.: 23STCV02673

[Assigned for all purposes to the Hon.
Kristin S. Escalante, in Dept. 24]

**DECLARATION OF CAYA
RODRIGUEZ IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT**

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7. I do not believe I was provided with opportunities to take full, uninterrupted 10-minute rest periods while working with Defendants and I am informed and believe my coworkers

1 were often not provided with such an opportunity, either.

2 8. I do not recall receiving any premium pay for the full rest breaks I was not provided
3 an opportunity to take and am informed and believe that my coworkers were not provided
4 premium pay for not being provided with the opportunity to take full, uninterrupted 10-minute
5 rest periods, either.

6 9. I do not recall that I was indemnified with work-related expenses and am informed
7 and believe my coworkers were often not provided with such an opportunity, either.

8 10. I do not recall that I was vested with vacation time at the proper rate of pay and am
9 informed and believe my coworkers were often not provided with such an opportunity, either.

10 11. Before and during the course of litigation, I was actively involved in assisting my
11 attorneys to support the wage and hour claims asserted. My involvement began before the initial
12 complaint was filed wherein, I provided first-hand knowledge and documentation as to
13 Defendants' practices, their ownership and corporate structure, and their wage and hour policies
14 and practices. Part of the information I relayed was with regard to Defendants' timekeeping
15 policies and practices and their meal and rest period policies and practices.

16 12. I provided them with all the documentation provided to me by Defendants during
17 my employment.

18 13. I assisted in reviewing time and payroll records with my attorneys and informed
19 them of Defendants' employment policies and whether those policies matched Defendants'
20 practices.

21 14. My attorneys called me to ask me questions over several times throughout the
22 litigation and I contacted my attorneys several times to stay updated on the case and offer my
23 assistance on any matters I could be helpful with. I was also available for mediation by telephone,
24 during which I was available to be called to answer the questions posed by the mediators regarding
25 the asserted claims, as well as arguments raised by Defendants. In addition, I worked with my
26 attorneys over the next several weeks after mediation to understand and execute a long form
27 settlement agreement.

1 15. Over the past few months since the mediation has been resolved, I have stayed in
2 touch with my attorneys to ensure that there was no undue delay in payment for other class
3 members for whom I brought this Action.

4 16. I believe that, through the present, I have spent at least 32 hours in connection with
5 this matter, which included time spent having preliminary calls with my attorneys; doing an intake
6 with my attorneys; time spent searching for documents relating to my employment; time spent
7 reading and understanding the Settlement Agreement; time spent answering calls to discuss
8 Defendants' timekeeping, pay, meal and rest periods, and to review time and payroll records; time
9 spent discussing with my attorneys' Defendants' policies and practices; time spent on-call at
10 mediation; and time spent checking in on the status of the case, among other things. I also spent
11 time preparing this declaration to support Plaintiff's Motion for Preliminary Approval of Class
12 and Representative Action Settlement.

13 17. I feel that by bringing this lawsuit, I could stand up for not only my rights but the
14 rights of other employees who suffered from the same unfair wage practices. I felt that current
15 employees might not want to share their experiences with Defendants since they feared losing
16 their jobs. This is certainly understandable as I, too, have to provide for myself and others.

17 18. By bringing this lawsuit, I have put the interests of the class ahead of my own.

18 19. I understood that I could possibly earn a small enhancement if this case resolved
19 favorably. I also knew that I could face retaliation from Defendants and backlash from former
20 coworkers who are loyal to Defendants. I have also had to provide a general release of claims to
21 Defendants as part of the settlement. My understanding, in addition, is that if I brought this case
22 individually, I may have earned more compensation individually and on a much quicker timeline
23 than the timeline to resolve this Action.

24 20. My goal in bringing this lawsuit was to obtain a recovery on behalf of the class,
25 and, even more importantly, to put an end to what I believe are illegal practices on the part of
26 Defendants. I believe I have achieved both through this lawsuit and settlement.

27 I declare under penalty of perjury under the laws of the State of California that the
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1 foregoing is true and correct this 02/28, 2025, at Fresno, California.

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Caya Rodriguez (Feb 28, 2025 13:50 PST)

CAYA RODRIGUEZ

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